



## **South Norfolk Local Development Framework: Statement of Community Involvement (SCI)**

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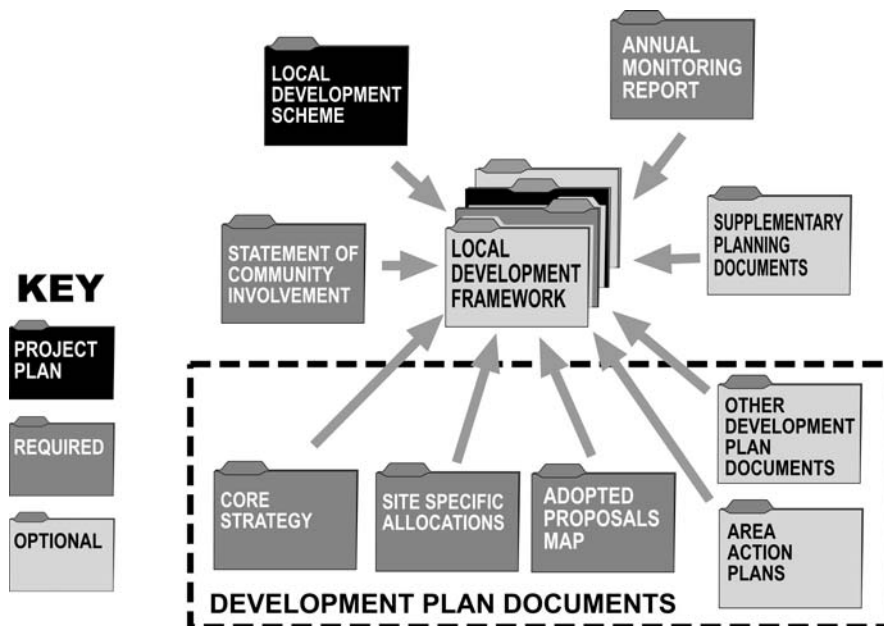
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# South Norfolk Local Development Framework: Statement of Community Involvement (SCI) December 2006

## 1. Introduction and Context

The Government has introduced a new system of development plans which replaces Local Plans, Structure Plans and Regional Planning Guidance with Local Development Frameworks (LDFs) and Regional Spatial Strategies (RSSs). Putting this system into practice involves South Norfolk Council replacing the South Norfolk Local Plan and existing Supplementary Planning Guidance (SPG) with a Local Development Framework (LDF). The LDF will be made up of a series of Local Development Documents (LDDs) and Supplementary Planning Document (SPDs). The Statement of Community Involvement (SCI) is one of these LDDs. A list of the main documents and terms is contained in Appendix 1.



Adapted from ODPM publication 'Creating Local Development Frameworks'

Once they are written the main Development Plan Documents (DPDs) will be used to make decisions on planning applications in South Norfolk. The LDF and the Regional Spatial Strategy, known as the East of England Plan, will make up the Development Plan for the district; further details on the East of England Plan can be found at [www.eera.gov.uk](http://www.eera.gov.uk).

One of the main changes in the new planning system is for councils to improve the opportunities for people to become involved in the planning of their area. The

Government wants councils to make sure people get involved early in the process, so that their input can be taken into account from the start. This SCI sets out how the Council intends to involve people in producing, and then later reviewing, the LDDs for South Norfolk. As well as involving people in producing the LDF the SCI shows how people can be involved in decision making on planning applications for major proposals.

The South Norfolk SCI sets out how the Council will meet the Government's requirements as set out in the legislation<sup>1</sup>. The regulations make it clear that the Council must make sure that community involvement meets the duties set out in the Race Relations (Amendment) Act 2000 and the Disability Discrimination Act 1995. This will involve promoting race equality and ensuring fairness and equal treatment when carrying out consultation, and not discriminating by providing a lower standard of service to disabled people. It also involves positive actions such as offering Braille, large print text, audiotapes or translation into other languages when needed.

South Norfolk Council has already been improving the ways in which it involves the community in the planning process. This document sets out what the Council has already done and how it intends to build on this when preparing future plans. Different techniques and approaches will be needed at different stages and for different groups and this document sets out the minimum standards the Council aims to reach.

## **2. The Aims of Community Involvement**

The Council understands how important it is to involve the community. Engagement with the community 'in developing services they want and need' is one of the Council's Corporate Objectives.

In the SCI 'community' is being used in its widest sense: the community is a group of people and organisations which have a common interest, in this case an interest in the future development of South Norfolk. As well as South Norfolk residents this includes the people who work in or regularly visit the district, as well as the business community. The Council also talks about consulting with 'stakeholders'. This means anybody who has a 'stake' or interest in a particular issue, either because they will be directly affected by the outcomes, have a technical or professional interest, or they may be required to act upon/put into practice the final policies and proposals.

The Government has underlined how important it is to start community involvement at an early stage in producing LDDs. There are lots of advantages to involving the community, these include:

- Making it clear that the Council is open and accountable;
- Greater understanding by the Council of the things that are most important to the community and stakeholders;
- Wider public awareness of how planning works and understanding what can and can not be done through the different parts of the planning system;

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<sup>1</sup> Town and Country Planning (Local Development) (England) Regulations 2004

- Greater understanding by the public of the final planning policies and the planning decisions which follow these policies – this can help to avoid unnecessary objections to planning applications when the main principles have already been established;
- Opportunities to increase the exchange of information between interested parties, including service/utility providers, landowners and neighbours, to resolve differences at an early stage;
- Efficient use of resources, including the potential to use the skills, knowledge and resources of the community and other people involved in the process.
- Developing the skills of the community to help them make the most of being part of the planning and development process.

Overall greater community involvement will improve the quality of decisions and outcomes.

The Government wants councils to get as much agreement as possible about the policies and proposals in the LDF. This should result in less time spent when the documents are examined by a Planning Inspector, quicker decision making on planning applications (particularly for applications on allocated sites) with greater certainty for everybody involved.

### **3. Preparation and Links with the Sustainable Community Strategy**

The Government sees LDFs as an important way of delivering Sustainable Community Strategy objectives, particularly those that have a spatial dimension. South Norfolk Council is already committed to making the links between these processes and documents stronger. The elected members are guiding this work through the joint Local Development Framework/Sustainable Community Strategy Steering Group.

A lot of work has already taken place consulting the public as part of the review of the Sustainable Community Strategy. This has included the district wide Up 2 U 2 consultation and training staff in methods of improving community involvement. More details about the experience gained during Up 2 U 2 are contained in Appendix 2.

The Council has an ongoing commitment to maintaining the strong links between the consultation processes for the LDF and the forthcoming Sustainable Community Strategy, working with the current cycle of reviewing the Strategy every three years and the intervening annual action plans.

The methods that have already been used successfully and the lessons learned about areas that need to be improved have been used to develop the consultation procedure set out below.

### **4. Procedure**

Because of the large number of documents that will make up the LDF, and the process of continuously consulting and feeding back, the Council will need to make it clear at each stage what the scope and purpose of the consultation is. There are a number of things (e.g. the status of nationally designated wildlife sites or the overall housing

numbers for the district), which consultations will not be able to change; therefore people need to be given information which enables them to make contributions on those things they can influence.

Each consultation will need to make clear:

- What document is being prepared;
- What stage in the process it is (e.g. first draft, revised draft, formal submission);
- The issues/questions on which we want people to give their views;
- What people are being asked to do (e.g. fill in a questionnaire, attend a meeting, join in an interactive event etc.)
- When responses need to be received by;
- How responses will be used and what they can/cannot influence in the documents;
- How and when results of the consultation will be available;
- How decisions will be made using the results of the consultation; and
- What the future stages in the process are.

It should also be clear that personal details and information supplied will be treated in accordance with the Data Protection Act 1998 and the Freedom of Information Act 2000.

#### **4.1 Target Groups**

The overall aim of the SCI is to set out how the Council will increase engagement with the community and stakeholders.

Annex E of Planning Policy Statement 12 identifies a number of bodies that the Council should consult, if it considers the Development Plan Documents contain proposals that would affect that body, the 'specific consultation bodies' are identified in Appendix 3. As already noted, one of the Government's main aims is to widen the number and type of people who take part. Therefore the Council will expect to involve at some level all of the groups below:

- The general public – the Council will aim to get a response that is representative of the population of the District or of the particular area under consideration.
- Councillors (including County Councillors)
- Town and Parish Councils
- Development Partnerships
- Partner organisations on the South Norfolk Alliance
- The business community
- Developers/landowners/agents and those on the Council's database who want to be kept informed about the LDF
- Central, Regional and Local Government (including Government Agencies, neighbouring authorities and Norfolk and Suffolk County Councils)
- Service providers and utilities
- National and local amenity, campaign, interest and support groups (such as groups representing environment/conservation/heritage concerns, access/disability issues, and religious/ethnic/race concerns)

- Young people, including School Councils and South Norfolk Youth Action
- South Norfolk Older People's Forum

A list of groups is contained in Appendix 3, some generic groupings are included to reflect the fact that consultees may be added to (or removed from) the process over time. As part of the consultation on this SCI the Council has asked for any additions to the list of consultees and further additions can be made at any time. Individuals, groups and organisations will also be given the option of being removed from consultation lists on request, either for the whole process or in relation to particular documents.

The Council will consider the role of each of the above groups at each stage of the process, to comply with the Government's regulations but also avoid unnecessary repetition and 'consultation fatigue'. The Council will also consider whether it is necessary to send full copies of documents or whether to notify parties of their availability. Groups and organisations that respond may themselves be asked how widely they have consulted when making a response.

## **4.2 Methods & Resources**

From the work and training already undertaken, and the lessons learned from previous experience, the Council will be able to use a number of techniques and resources at different stages. Each stage of consultation is likely to be different in terms of:

- The documents being produced
- The ways in which we publicise documents and events e.g. letters, advertising etc.
- The ways in which we consult e.g. questionnaire, exhibition etc.
- Methods for feeding back the results e.g. direct to participant, via the media etc.

A number of the techniques proposed, such as commercial advertising on the radio, bus tickets/shelters and hoardings, more interactive use of the Council's website and choosing a variety of venues to hold events, will be being used by the Council for the first time. The aim is to increase the number and range people who become involved. All printed material will be offered in Braille, large print, audio and translation options – to date no commonly used community languages have been identified for South Norfolk, however the IN TRAN facility will be publicised in all printed material. A number of groups are traditionally more difficult to engage. In South Norfolk these include: Black and Minority Ethnic groups (the most significant being the Chinese and Gypsy and Traveller communities); people with sight, hearing, speech and mobility impairments; people with literacy difficulties; and younger people. The techniques identified below involve a number of methods of contact and response that are appropriate to these groups. In particular techniques that involve face-to-face contact and offer the opportunity for one-to-one responses e.g. exhibitions, Planning for Real<sup>®</sup> and workshops are likely to be most effective. In addition, if it is appropriate to target specific groups it may be necessary to use peer-to-peer methods to increase the likelihood of engagement.

Methods and resources include:

- **Printed material** – the most traditional method of consultation. Publications can take a variety of formats, both formal and informal. Language will be straightforward, avoiding jargon and clearly explaining any technical terms. Printed material will be made available through the Council's offices and local libraries and sent directly where the Council considers this appropriate. Responses will be invited by paper copy, via e-mail, using the website and the Council will investigate the potential of responses via text message where appropriate.
- **Summary leaflets** – these can be used to present the highlights of the main printed material in a shortened, more easily digestible format. Summary leaflets to target specific groups could highlight particular parts of the consultation, include greater use of images/graphics, and use bolder, more provocative statements/questions. Where appropriate summary material will be sent direct to potential respondents, either by post or e-mail. Other methods could include postcards aimed at younger age groups, targeting specific questions/topics in an informal style.
- **The Link** – South Norfolk Council's twice-yearly newsletter, delivered to every house, to include regular updates including timetables of events, progress on particular topics and feedback of results.
- **Website** – The Council must put the Local Development Scheme (which includes the overall timetable for producing the main documents), plus many of the consultation versions of DPDs on the internet. Dedicated space within the Council's website, regularly updated and with a direct link from the front page, will include versions of all the publications/leaflets/questionnaires/feedback etc to download in appropriate formats e.g. pdf files or word documents. The website may also include discussion forums on particular topics/questions and facilities for making responses via the website.
- **Letters/e-mail alerts/invitations** – direct contact used to bring peoples' attention to publications, leaflets, events, opportunities to comment etc.
- **Advertising** – adverts to be used when appropriate. These may cover a variety of media targeting particular groups and areas. As well as local newspapers and parish magazines, locations/methods could include radio advertising or adverts on beer mats (targeting the 18-35 age group), bus stops/tickets on particular routes and hoardings close to particular sites/locations.
- **The media (press/radio/tv)** – press releases publicising the overall process(es), individual publications and events, important/controversial topics, feeding back results etc. and formal press notices when required.
- **Exhibitions & meetings** – presentation of information, with opportunities to ask questions/provide verbal or written feedback on questionnaires, forms, discussion boards etc. The choice of times and venues will influence the types and number of people who attend, see section 4.2.1 below. Specific meetings could be used to address particular groups and topics.
- **Facilitated workshops** – trained facilitators (external or from within the Council staff) gathering information, assisting discussion/debate and providing the opportunity to give feedback within a structured session; particularly useful in trying to engage hard to reach groups or for discussing specific topics.

- **Planning for Real<sup>®</sup> events** – a range of techniques which could be used to gather issues, these are likely to be most valuable for site-specific proposals, helping choose the most important issues, identifying timescales/capacity/resources and looking at possible solutions. Planning for Real<sup>®</sup> can also look at why people have negative reactions to proposals and how these might be overcome. Planning for Real<sup>®</sup> is useful because it involves a variety of techniques that appeal to different people.
- **Elected members** – the Council's Members will have an important role to play both in distributing information to their communities and, through the Committee process, taking decisions about the content of the LDDs using the results of consultation. As with other decisions taken through the democratic process, the public will be able to make representations directly to their local member.
- **Existing forums** – using existing networks, such as the South Norfolk Alliance, the Policy Development Panels, South Norfolk Youth Action, Area Forums, Older People's Forum, Planning User Panel etc. to both discuss issues and feedback results.
- **South Norfolk Citizens Panel** – The Citizens Panel, which was run by MORI until 31 March 2005 and by RBA Research from 1 April, can be used to send questions to a sample of the population who can be accurately subdivided by age, gender, location, occupation etc. The Panel will also be a useful check against which to test particular techniques and/or results and can also be used to engage with hard to reach groups.
- **Parish Plans** – where these exist they will provide a valuable source of information on the local community's views on a range of planning related issues.

Following Up 2 U 2 members of the Citizens Panel were asked what methods of communication they would like the Council to use to keep them informed about future consultations. The results indicated the importance of more traditional media, particularly The Link (71%) and local newspapers (47%), however local radio (19%), advertisements on public transport (8%) and the Council's website (7%) will also be important channels of communication.

All publications and publicity material should include clear contact details for people who want further advice and information.

#### 4.2.1 Venues

The Council will aim to hold all events at venues that have good access for everybody. Venues should be within easy distance of the local community for walking and cycling and on a public transport route, as well as having enough car parking. The Council will also aim to choose locations that reflect the geographic spread of the population. Given the rural nature of large parts of South Norfolk, it may not always be possible to use venues which allow easy access for all; where this is the case clear information about other methods of participating will be available. Events will be timed to allow as many people as possible in the target audience to attend, taking into account working hours, school/public holidays, other known events etc. When targeting specific groups venues will be chosen accordingly e.g. using colleges or student unions to target the 18-35 age group.



#### 4.2.2 *Planning Aid*

People who want to be involved can sometimes be put off by the complexity of the planning system and the policies and proposals produced. The local Planning Aid system offers a way guiding individuals and groups who wish to be involved on how to make the most of their contributions. The Council has supported the Planning Aid Concordat<sup>2</sup>. The Council will liaise with the local Planning Aid co-ordinator on when it is most appropriate for groups and individuals to use their limited resources and how to publicise the Planning Aid service.

### 4.3 **Feedback**

As well as making good use of the techniques for gathering information it is important to feed back the results regularly. Feedback allows people to see how their contributions have been taken into account and to maintain their confidence in the process. Feedback needs to be relevant, concise, and easily understood.

Relevant formats include press releases, The Link, publications produced by other parties (e.g. parish council newsletters), the website (which includes a 'have your say/results of previous surveys' page), and direct letters/e-mails.

Consultations (documents, events, meetings etc.) will include information on what the subsequent stages in the process are, when feedback can be expected, what methods will be used and how the results will be used in the decision making process. In addition, database contacts will be alerted to the availability of results and, where applicable, to when elected members will consider the results. Further details on the timing of the stages in the LDF preparation can be found in the Local Development Scheme, copies of which are available from the Council and on the Local Development Framework section of the Council's website ([www.south-norfolk.gov.uk](http://www.south-norfolk.gov.uk)).

Results will be used to inform the future stages in the production of the document concerned; this will initially be via the steering group of elected members, and then in any subsequent decisions made by the Cabinet and Council.

Responses to individual letters, faxes and e-mails received outside the main consultation processes will be made within the Council's target time scale of 10 working days.

### 4.4 **Monitoring**

Because the SCI is itself a Local Development Document it will be monitored and reviewed to check that the methods and techniques being used are still the most appropriate. In the LDS (available on the Local Development Framework section of the Council's website) the SCI is timetabled for review after work on other parts of the LDF has progressed, this will give the opportunity to assess the effectiveness of techniques in

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<sup>2</sup> The Planning Aid Concordat has been prepared by the Local Government Association, the Planning Officers Society and the Royal Town Planning Institute to demonstrate their joint commitment to Planning Aid. Local authorities have been invited to share the commitment through practical action; the Local Development Document/Community Strategy Steering Group resolved to provide £500 support in the 2004/5 financial year.

the production of the first phase of LDDs and SPDs and revise the SCI before these LDDs and SPDs are themselves timetabled for review. The success and effectiveness of the SCI will be reviewed through the Annual Monitoring Report (AMR).

As with previous consultations, such as Up 2 U 2, the Council will undertake periodic evaluation of the effectiveness of techniques using the database of LDF contacts (including the groups listed in Appendix 2) and the Citizens Panel; the latter being used to target those who did not get involved, or were not aware, to find out why and if future consultations could be improved. Satisfaction questions can also be included with the consultation material. The results of these surveys could trigger an earlier review of the SCI.

#### **4.5 South Norfolk Council Capacity**

Increasing the level of community involvement, particularly using the new methods set out above, will have an impact on Council resources. The Council's Planning Policy staff will be the main point of contact throughout the LDF process. However, involving the community will call on the resources of a number of Council services, these include:

- E-Government (ensuring information and documents on the website are available promptly and are kept up-to-date);
- Communications Team (design/production of documents, helping produce and distribute publicity material, helping ensure documents are in plain English);
- Economic and Community Development Team (assisting with events and co-ordinating with other/ongoing community involvement, including Parish Plans);
- Community Partnerships and Active Citizenship (co-ordination with the Sustainable Community Strategy and targeting specific/hard to reach groups); and
- Council-wide (facilitating groups, staffing exhibitions, ensuring co-ordination with other Council consultations and initiatives etc.).

Setting out a clear project plan based on the Local Development Scheme will allow the Council to programme the majority of events well in advance and therefore make sure enough resources are available. This will include timetabling publications and decision making into the main Committee cycles as well as the Local Development Framework/Sustainable Community Strategy Steering Group.

A budget for the LDF process is already in place and it is hoped that investment early in the LDF process, improving understanding and agreement between different parties, will result in fewer resources being needed at the formal examination stage. A number of costs are already covered or are budgeted for under other programmes e.g. training of council staff in a range of community involvement techniques (see Appendix 2); combining initial consultation with the Sustainable Community Strategy process; use of the Citizens Panel and other established groups etc.

The Council is committed to meeting the minimum standard of consultation set out **in bold** in table 5.1 below. However, the choice of *additional* methods of community involvement will need to take into account the constraints of the budget. The benefit of individual techniques, particularly those that could involve higher costs, will be assessed

as part of the project plan that underpins each LDD and will be tailored to adapt to any particular issues and concerns that arise.

## 5. The Local Development Documents

The LDF will be made up of a series of documents and each document will need to go through various consultation stages. These stages will be different for Development Plan Documents, which are subject to independent testing, and Supplementary Planning Documents. The Local Development Scheme (LDS) sets out the timetable for producing and reviewing all of the elements of the LDF. Broadly this shows each document being subject to consultation on:

- Evidence gathering/informal consultation;
- Preferred options;
- Six weeks formal 'deposit', following submission to the Secretary of State of the Councils preferred version of each Development Plan Document – An additional period of 6 weeks consultation is allowed after submission but before examination in the event of site allocation representations being duly made.

The LDS is available on the LDF section of the Council's website and at the Council's offices. If necessary the LDS will be revised following the Annual Monitoring Report (AMR), which assesses progress on producing the various documents.

As a signatory to the Norfolk Compact, which is an initiative to improve relationships between the Public Sector and the Voluntary and Community Sectors, the Council has agreed to allow a minimum eight weeks for responding to written consultations. This will be included in the Local Development Scheme, the exceptions to this are the six-week formal deposit periods set out in the legislation<sup>1</sup>.

After each stage it will be necessary to ensure that there is feedback both to those who have been directly involved and to the wider community. The details of the respondents to each stage will be used to update the database of contacts for future consultation.

The techniques shown in **bold text** will be the minimum standard the Council will implement at each stage. All of the groups in 4.1 above will targeted using these techniques, unless there have been specific requests not to be involved. The other techniques will be used both to broaden the consultation where resources permit and/or where specific issues, concerns and/or target groups are identified that would benefit from their use.

**Table 5.1**

| Stage  | Techniques  |
|--|---|
| Evidence gathering/<br>informal consultation<br>(Regulation 25)                          | <ul style="list-style-type: none"> <li>• <b>Printed material/questionnaire</b> (available from South Norfolk Council, Norfolk County Council &amp; libraries and sent directly where the Council considers this appropriate);</li> <li>• <b>Summary version of the printed material</b> (available from South Norfolk Council, Norfolk County Council &amp; libraries);</li> <li>• <b>Website – updated with relevant downloads</b> (full documents, press releases, leaflets, questionnaires, diary of events etc.) &amp; discussion forum;</li> <li>• <b>Press releases</b> – overall process, specific events;</li> <li>• <b>Letter/e-mail</b> alerts to database contacts;</li> <li>• <b>Exhibitions/meetings</b> – opportunity to present information (display boards/literature) &amp; gather responses (face to face/discussion boards/flags in maps/forms);</li> <li>• Advertisements (radio/press) – to promote the overall process;</li> <li>• Facilitated workshops – structured to gather feedback on general issues and identify priorities rather than answer specific questions;</li> <li>• Summary of results (published in The Link, press release, website, letter/e-mail to respondents).</li> </ul> |
| Preferred Options<br>(Regulation 26)   | <ul style="list-style-type: none"> <li>• <b>Printed material</b> (available from South Norfolk Council, Norfolk County Council &amp; libraries and sent directly where the Council considers this appropriate);</li> <li>• <b>Summary version of the printed material</b> (available from South Norfolk Council, Norfolk County Council &amp; libraries);</li> <li>• <b>Website – updated with relevant downloads</b> (full documents, press releases, leaflets, questionnaires, diary of events etc.) &amp; discussion forum;</li> <li>• <b>Press releases</b> – overall process, specific options/questions;</li> <li>• <b>Formal press notices</b>;</li> <li>• <b>Letter/e-mail</b> alert to database contacts;</li> <li>• Planning for Real ® events – extensive use of techniques, particularly for comparing the merits of different options/sites;</li> <li>• Summary of results (published in The Link, press release, website, participants alerted by letter/e-mail).</li> </ul>  |
| Consultation on the<br>version submitted to the<br>Secretary of State<br>(Regulation 28) | <ul style="list-style-type: none"> <li>• <b>Printed material</b> (available from South Norfolk Council, Norfolk County Council &amp; libraries and sent direct to DPD bodies);</li> <li>• <b>Website – updated with relevant downloads</b>;</li> <li>• <b>Press release</b>;</li> <li>• <b>Formal press notices</b>;</li> <li>• <b>Letter and/or e-mail alert to database contacts.</b></li> </ul>  |

The process should also include a survey of satisfaction with the various elements, to highlight successful methods and areas for improvement.

The following sections set out the particular considerations in relation to each of the main types of Local Development Document. Considerable care will need to be taken not to confuse and overload the public and other stakeholders with multiple consultations. At each stage it will be necessary to be clear about what is being consulted on and how this

fits into the overall structure. Using the Council's website to keep an up-to-date Local Development Scheme timetable of past and future events will be essential.

## **5.1 Core Strategy & Development Control Policies**

The Core Strategy will set out the long-term vision for South Norfolk. It will therefore include the strategic policies dealing with where the main locations for development will be, major issues such as protecting the landscape and floodrisk, and how South Norfolk will deal with major developments such as housing and wind turbines. Development Control Policies will primarily cover how the impacts of particular developments will be assessed when planning applications are received.

As the Core Strategy sets out the vision for the district and will provide the framework for the site-specific policies, wide involvement across the Target Groups will be essential. The most appropriate techniques will be exhibitions and workshops that allow participants to engage in a wide range of topics and more strategic issues. Specific questions can be posed via other methods such as web discussion board, postcards, adverts etc. on specific high profile issues.

Consultation on Development Control Policies may well take place alongside the Core Strategy for many target groups, however more focussed engagement with practitioners in the development industry, e.g. the existing Planning User Panel, would also be beneficial.

## **5.2 Site-Specific Policies, Proposals Map & Area Action Plans**

It is likely that housing allocations will form the largest and most contentious aspect of the site-specific allocations. However the review of existing allocations, and allocation of new sites for employment, open space/leisure and retail uses will also be considered. For each site the consultation will be on a variety of fronts:

- involvement of landowners, agents and potential developers;
  - identification of constraints with service providers, the highways authority, government agencies, environmental/conservation bodies etc.; and
  - engagement with the community and early involvement of the Parish/Town Council.
- The use of Planning for Real<sup>®</sup> techniques will be particularly important in attempting to resolve some of the obvious conflicts which arise from allocating sites. Techniques are likely to concentrate on a comparison of the alternative sites, how sites can best be integrated into existing settlements/communities and look at what benefits could be generated from new development. The existence of Parish Plans may also help identify community priorities.

Although Area Action Plans (AAPs) are likely to focus on relatively small, defined geographical areas the scope of each AAP will be different. The key stakeholders are likely to be those in the immediate vicinity of the AAP, however some may have a wider, more strategic function and the consultation would be targeted accordingly. Planning for Real<sup>®</sup> techniques identifying existing strengths, weaknesses, possible solutions and priority setting will be key.

### 5.3 Sustainability Appraisal

Sustainability Appraisal is a continuous process to ensure that any plans are considering, in a systematic way, the impacts of their proposals on social, environmental and economic matters.

The first stage involves the preparation of a Scoping Report, which offers the opportunity to shape the processes and framework for assessing the impacts. The Council is required to consult English Heritage, Environment Agency and the Natural England and other appropriate social and economic consultees as outlined in Planning Policy Statement 12. As a first stage we will consult with the above bodies and also<sup>3</sup>:

- East of England Development Agency
- East of England Regional Assembly
- Norfolk County Council
- Norfolk Primary Care Trust
- Norfolk, Suffolk and Cambridgeshire Strategic Health Authority

Following the preliminary consultation amendments will be made to the Scoping Report before it is circulated to a wider group of stakeholders.

The Scoping Report will contain an Appraisal Framework, which will be used to assess the impacts of particular policies and allocations on sustainability. It is therefore important that, through the Scoping Report we establish objectives and indicators to measure the effects.

The statutory process of plan production requires production of Sustainability Appraisal Reports to accompany the Preferred Options and Submitted Document stages of DPD production, and also for SPDs.

### 5.4 Supplementary Planning Documents

SPDs will be used to expand upon policies in the Local Development Documents. The Council will engage with relevant sectors of the community in gathering evidence to prepare draft SPDs. However, for each SPD the main stage of consultation will be on the draft SPD itself. Methods and techniques will vary depending on the content of the SPD being produced i.e. tailoring the methods used and the groups targeted to the specific localities or subject areas under consideration. However, in all cases community involvement on the draft SPD will reach the minimum standard set out for Regulation 25 consultations in Table 5.1, with the exception that letter/e-mail alerts will target appropriate organisations and individuals. The Council will also investigate the possibilities of adopting Parish Plans as SPD or developing aspects of Parish Plans as part of SPD.

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<sup>3</sup> Consultation will take place with successor bodies when re-organisations occur.

## **5.5 Statement of Community Involvement**

Section 4.4 notes that the SCI will itself be subject to monitoring and review. To ensure that the methods and techniques used are appropriate to the whole of the community, as defined in Section 2, review of the SCI will be subject to the minimum standards set out in table 5.1. As section 4.4 notes, additional techniques will be used to target people who have not previously engaged with the LDF process.

## **6. Significant Development Control Decisions**

### **6.1 Planning Application Process**

The Council has a well-developed process for consulting on major planning applications. The Council encourages pre-application discussions, which can include bodies such as the highway authority, Norfolk County Council and other service providers, and can identify the areas of agreement and the main problems. However, this does not generally involve the wider community. The Council encourages developers to contact town/parish councils and local community groups at the pre-application stage, however the Council can not insist that this is carried out.

Once an application is made it is publicised in a variety of ways:

- Site notice(s) in a prominent location;
- Letters to residents, businesses and other neighbours considered to be materially affected by the proposal;
- Consultation letters to local South Norfolk member(s) and parish council(s);
- A weekly list of all new applications sent to those who request it (paper or electronic copies) also available on the Council's website;
- Newspaper notices for specific applications based on their sensitivity (Listed Buildings, Conservations Areas); size/complexity (Major Applications, proposals contrary to policy) or where they are considered to be of public interest;
- All new applications are also available to view on the Council's website.

Notices and letters make it clear when and where the application(s) can be viewed, when responses need to be made by and who the Case Officer is. Responses can be made in writing, via e-mail or directly via the website.

Where requested Planning Officers are willing to attend public exhibitions and meetings about major proposals.

The results of any consultations will be reported to the relevant Committee as part of the officer's report. As part of the Committee process for those supporting or objecting to an application there is an opportunity to bring particular issues to the Committee's attention – this could include the results of consultation. In the event that an application is not determined by committee, the results of any consultation will form part of the case officer's assessment of the proposals and summary information will be included in a delegated report. All aspects of planning applications including supporting information are available via the Council's website, therefore increasing the availability of information and allowing a further opportunity to scrutinise consultation results. Details on how to go

about speaking at Committee are set out in the Council's leaflet 'Have your say on planning applications', which is sent to all residents notified about, or commenting on, a proposal.

## **6.2 Major Applications – Improving Community Engagement**

Under the current procedures the emphasis has been on the consultation with the wider community occurring *after* the application has been received. That consultation has been guided/coordinated primarily by the Council.

Under the guidance outlined in the ODPM document 'Community Involvement in Planning: The Government's Objectives' the emphasis will change, with applicants for major developments being expected to undertake 'pre-application discussions and early community consultation'. The main aim is to avoid unnecessary objections once an application has been made. The Council will encourage developers to engage with the community before proposals become definite in order to establish concerns and issues that need to be addressed by the application. The most relevant techniques are those listed for site-specific policies and proposals in paragraph 5.2 above. Councils will need to balance the need for effective community engagement with the need to meet targets for the handling of applications within a set number of weeks. Many Significant Development Control Decisions will relate to sites that have been allocated by the current Local Plan process or will be allocated as part of the LDF. Consequently the community consultation can build on the work that will already have been done on such sites. Further information on what the Council expects in relation to different types of application is set out in Appendix 4.

For major applications (50 + dwellings and employment development over 2000 sq meters) the Council will use a project team approach, including at least two senior planning officers, representatives from the applicants, officers from other Council departments and other outside bodies as appropriate.

The Council will also continue to consult, invite comments and provide feedback as set out in 6.1 above.



## Appendix 1 – Glossary

**Annual Monitoring Reports (AMRs)** – an annual report setting out the progress in terms of producing LDDs and in implementing policies.

**Area Action Plans (AAPs)** – used to provide the planning framework for areas where significant change or conservation is needed. A key feature of area action plans will be the focus on implementation.

**Core Strategy (CS)** – sets out the vision, spatial strategy and core policies for the spatial development of the Local Planning Authority area, the other main DPDs should follow from the vision and strategy in the Core Strategy.

**Development Plan** – the DPDs prepared by District and County Councils which together with the relevant Regional Spatial Strategy (RSS) form the statutory Development Plan.

**Development Plan Documents (DPDs)** – subject to independent testing and have the weight of development plan status. Includes:

- Area Action Plans (AAPs)
- Core Strategy (CSs)
- Proposals Map (with Inset Maps, where necessary)
- Site Specific Policies and allocations of land

**Local Development Documents (LDDs)** – two types:

- Development Plan Documents (DPDs)
- Supplementary Planning Documents (SPDs)

**Local Development Framework (LDF)** – the name given to the portfolio of Local Development Documents (LDDs), also includes:

- Statement of Community Involvement (SCI)
- Local Development Scheme (LDS)

**Local Development Scheme (LDS)** – sets out details of each of the LDDs to be produced and the timetable and arrangements for production.

**PINS** – the Planning Inspectorate

**Proposals Map** (with Inset Maps, where necessary) – illustrates all the policies and proposals contained in development plan documents

**Regional Spatial Strategy (RSS)** – replaces Regional Planning Guidance and sets a regional framework that addresses the ‘spatial’ implications of broad issues like healthcare, education, crime, housing, investment, transport, the economy and environment (may include sub-regional level policy). The local RSS is the East of England Plan, which includes sub-regional policies for the Norwich sub-region.

**Site Specific Allocations** – allocations of land for particular reasons.



**Statement of Community Involvement (SCI)** – Specification of how it is intended to involve stakeholders and communities in the process of producing LDDs. SCI is subject to independent testing but is not a DPD.

**Strategic Environmental Assessment (SEA)** – an assessment of the environmental effects of a draft plan or programme, which is open to public consultation.

**Supplementary Planning Documents (SPDs)** – not subject to independent testing and do not have development plan status. However, they should be subject to rigorous procedures of community involvement.

**Sustainability Appraisal (SA)** – all policies and proposals in DPDs will be subject to Sustainability Appraisal and Strategic Environmental Assessment (SEA) to ensure they reflect sustainable development principles.

## Appendix 2 – The Up 2 U 2 Process

### 1 Linking with the Sustainable Community Strategy

The following information shows how the Council is actively committed to both strong links between the LDF and the Sustainable Community Strategy and to developing a range of methods in order to maximise participation in the LDF process.

Consultation on the review of the Sustainable Community Strategy started in mid-2003 through a process called Up 2 U 2. Although this was very early in the process of preparing an LDF, the Council took the opportunity to include some, more detailed, planning related questions.

The main elements of the Up 2 U 2 consultation were:

- Leaflet and questionnaire sent to all households in the District, and extra copies distributed to all local libraries. Letters highlighting the availability of the leaflet and questionnaire sent to:
  - Other bodies, including parish councils, relevant local authorities, Government bodies/agencies, service providers, major institutions/employers, local amenity and special interest groups and planning consultants; and
  - Those who asked to be kept informed in their reply to the South Norfolk Local Plan user satisfaction questionnaire (sent out following the adoption of the current Local Plan).

In total over 4,000 responses were received;

- Summary leaflets and targeted questionnaires sent to local businesses, generating 118 responses;
- 20+ afternoon/evening and Saturday exhibitions were held at public venues throughout the district, attracting approximately 400 visitors;
- 20+ interactive workshops with existing groups, societies, meetings etc. targeting a variety of people including those traditionally seen as 'hard to reach', such as travellers, youth groups and carers. Similar workshops were held with a small number of Parish Councils. The workshops used council staff as facilitators.
- 3 school visits by the Council's Active Citizenship Co-ordinator.

These activities were promoted by press releases to publicise both the overall Up 2 U 2 process and the events. Members and Parish Councils were sent publicity material to advertise specific events and posters and flyers were used at locations close to exhibition venues (shops, schools, doctors surgeries etc.) immediately prior to the event. The leaflet, questionnaire and programme of events were available on the Council's website.

## **2 Developing Skills**

The results of Up 2 U 2 were disseminated through the Council's twice-yearly newsletter, The Link. Following this the Council and members of the South Norfolk Alliance sought to engage the public in prioritising and discussing potential solutions to the issues raised.

In order to get the most out of this exercise a number of staff, from the Council's Planning, Regeneration and Community Partnerships teams and from the Norfolk Rural Community Council, were trained in a variety of community involvement techniques known as Planning for Real<sup>®</sup>. The training looked at various methods for gathering people's views, using a range of interactive methods. As well as techniques for drawing out issues and concerns the training also looked at how to get people to:

- Recognise the connections between issues;
- Look for the underlying/root causes of problems, not just the effects;
- Prioritise issues and resolve differences in opinion;
- Identify possible solutions, who could carry them out and what resources/assistance would be needed; and
- Identify realistic timescales.

A number of techniques were put into practice at three locations chosen to represent various aspects of the District, Costessey (Norwich fringe), Harleston (market town) and Hempnall (rural village). A concluding session with the Neighbourhood Initiatives Foundation (NIF), who conducted the initial training, was used to draw together the experience of using various techniques, looking at both the successful elements and those that need improvement.

## **3. Collecting Information**

The above processes have already generated a considerable amount of data. This data includes:

- Stakeholders' views on a variety of topics;
- Stakeholders' suggestions about specific sites;
- Details of people who want to be kept informed of the various stages of, and opportunities to become involved in the LDDs.

From this we have developed preliminary databases of consultees and interested parties and sites which need active consideration.

## **4. Lessons Learnt**

From the analysis of data so far gathered and the concluding session with NIF, the Council has identified gaps in the responses when compared to the demographic profile of the District, particularly in terms of age groups and locations. The process has also highlighted some of the strengths and shortcomings of the techniques chosen for specific events.

Areas with opportunities to increase participation include:

- Targeting the 18–35 age group – as far as could be analysed these were noticeably absent from the responses to date;
- Lack of engagement of South Norfolk Alliance partners in public exhibitions.
- Engagement with hard to reach groups – although invitations to take part in facilitated workshops were sent to a wide variety of groups, the actual respondents were self-selecting and did not necessarily represent the ‘hard to reach’ groups
- Lack of public engagement in looking at potential solutions – i.e. people were happy to raise issues/areas of concern, but more detailed discussion about solutions was more problematic.
- Need to produce publicity material earlier in the process

Techniques to widen the scope of those taking part will include:

- Greater use of the website and e-mail
- Greater use of summary letters/leaflets, which could include bolder, more provocative messages and be easily translated into alternative formats (brail/large-print etc.)
- Regular feedback of information (to keep people involved and aware of how their contributions have been used).
- More targeted use of Planning for Real<sup>®</sup> techniques – experience to date has tended to show that many of the techniques would have been better suited to site-specific issues.

## **Appendix 3 – LDF Consultees**

(NB this is not exhaustive and includes some generic groups covering a wide range of individual organisations, where these are listed this refers to groups relevant to South Norfolk and also relates to successor bodies when re-organisations occur)

### **National & Regional Government**

Countryside Agency\*  
 Defence Estate Organisation (Lands) East  
 Department for Education and Skills  
 East of England Development Agency (EEDA)\*  
 East of England Regional Assembly\*  
 Environment Agency (Eastern Region)\*  
 Equal Opportunities Commission  
 Government Office for the East of England\* (Go East)  
 Government Pipeline and Storage System/Fisher German  
 Health & Safety Executive  
 Highways Agency\*  
 Members of Parliament for South Norfolk and Norwich South  
 Office of the Deputy Prime Minister  
 Oil & Pipeline Agency  
 Property Advisors Civil Estate (PACE)

### **Local Government**

Breckland Council\*  
 Broadland District Council\*  
 Broads Authority\*  
 Great Yarmouth Borough Council\*  
 Mid Suffolk District Council\*  
 Norfolk Association of Town & Parish Councils  
 Norfolk County Council\*– Head of Planning and Transport Strategy to co-ordinate  
 consultation/response covering: Highways and Transport; Minerals and Waste;  
 Planning Obligations; Community Strategy; Environment; Traveller Liaison;  
 Economic Development; Property; Education: Cultural Services; Social Services;  
 Norfolk Fire Service; Norfolk Landscape Archaeology  
 Norwich City Council\*  
 Parish Councils in and adjoining South Norfolk\*  
 Suffolk County Council\*(Environment & Transport)  
 Waveney District Council\*

### **Utilities & Service Providers**

Anglian Water\*  
 British Gas Properties  
 British Telecom\*  
 EDF Energy\*  
 Mobile Operators\*  
 Mobile Operators Association  
 N Power Renewables  
 National Grid Transco\*

National Power PLC\*  
 Norfolk Constabulary\*  
 Post Office Property Holdings  
 Royal Mail (Norwich & Anglia Region)  
 Transco East of England\*

**Environment, Heritage & Amenity Groups**

Settlement and area based amenity groups & societies  
 CABE (Commission for Architecture and the Built Environment)  
 Civic Trust  
 Countryside Management Projects  
 CPRE (National, Norfolk & South Norfolk)  
 Diss Environment Group  
 Energy Saving Trust  
 English Heritage/Historic Buildings & Monuments Commission for England\*  
 English Nature\*  
 Farming & Wildlife Advisory Group (Norfolk)  
 Forestry Commission, East of England  
 Friends of the Earth (National & Norwich)  
 Garden History Society  
 Georgian Group  
 Norfolk Gardens Trust  
 Norfolk Wildlife Trust  
 Open Spaces Society  
 Ramblers' Association (Norfolk)  
 RSPB (East of England)

**Transport (Non-Government)**

Bus Operators  
 Civil Aviation Authority  
 Network Rail  
 Norwich International Airport  
 Rail Operators  
 Strategic Rail Authority\*  
 Sustrans

**Youth & Education**

Connexions  
 Easton College  
 Norfolk Youth and Community Service  
 Schools in South Norfolk  
 Standout  
 University of East Anglia

**Minority Ethnic Groups**

Commission for Racial Equality



Gipsy Council  
Local Groups representing Black & Minority Ethnic interests  
Norfolk & Norwich Racial Equalities Council

### **Sport & Recreation**

National Playing Fields Association  
Sport England East

### **Health**

East Anglian Ambulance NHS Trust  
Norfolk & Norwich University Hospital NHS Trust  
Norfolk & Waveney Mental Health Partnership NHS Trust  
Norfolk, Suffolk and Cambridgeshire Strategic Health Authority\*  
Practice Managers for practices serving South Norfolk  
Primary Care Trusts

### **Employment & Business**

Business Link for Norfolk  
Chambers of Trade/Commerce  
Country Land & Business Association  
Diss Business Forum  
East of England Tourist Board  
Federation of Small Business  
Learning & Skills Council, Norfolk Area Team  
National Farmers Union  
Norfolk & Waveney Enterprise Services  
Norwich Area Tourism Agency  
Women's Employment and Enterprise Training Unit (WEETU)

### **Databases Held by South Norfolk Planning Policy**

Landowners, Developers and Agents expressing an interest in the LDF  
Agents regularly operating in South Norfolk  
Members of the Public expressing an interest in the LDF

### **Other**

Church Commissionaires  
Diocese of Norwich  
Development Partnerships  
House Builders Federation (Eastern Region)  
Housing Associations operating in South Norfolk  
Housing Corporation (Central Region)  
Norfolk Environmental Waste Services (NEWS)  
Norfolk & Norwich Voluntary Services  
Norfolk Rural Community Council  
South Norfolk Equalities Group

\* Specific Consultation Bodies, as identified in Annex E of Planning Policy Statement 12.



## Appendix 4 – Planning Applications

| Type of Application  | At what stage?  | Suggested action for the applicant   | Action by the Council   |
|--|-----------------|--|---|
| <p>Major Applications and Departures from the Development Plan:</p> <ul style="list-style-type: none"> <li>• Residential development over 50 units;</li> <li>• Other applications with a floorspace above 2,000sq.m;</li> <li>• Applications that do not conform with adopted development plan policies; and</li> <li>• Applications requiring an Environmental Assessment.</li> </ul> | Pre-application | <p>Pre-application discussions with Council officers – including advice on whether a masterplan or development brief is required.</p> <p>Pre-application discussions with infrastructure and service providers and environmental/conservation bodies to identify constraints and contributions towards infrastructure.</p> <p>Publicity and engagement with the community – including holding public exhibition(s), meeting(s) and press release/advert.</p> | General advice, by phone and in person at the Council’s main office.  |
|  | Application     | <p>In addition to any statutory requirements (design &amp; access statements, serving notice on site owners etc.) applicants to submit a statement outlining the methods and results of pre-application consultation.</p> <p>Press release &amp; public exhibition, if not undertaken at the pre-application stage.</p>  | <p>Site notice(s) in a prominent location(s).</p> <p>Consultation letters to neighbours considered to be materially affected by the proposals.</p> <p>Consultation letter to statutory consultees and other individuals/ organisations considered to be materially affected by the proposals.</p> <p>Inclusion in the Public Notices of the local paper.</p> <p>Inclusion in the weekly list of planning applications (available by subscription and at <a href="http://www.south-norfolk.gov.uk">www.south-norfolk.gov.uk</a>)</p> |

|  |                        |   |   |
|--|------------------------|---|---|
| <p>Major Applications and Departures from the Development Plan, cont/d.</p>  |                        |   | <p>Application available for inspection at <a href="http://www.south-norfolk.gov.uk">www.south-norfolk.gov.uk</a> and at the Council's main office – including facility to submit comments via the website.</p> <p>Attendance at public meetings where requested.</p> <p>Press release, where this is considered to be in the community interest &amp; has not been undertaken by the applicant.</p> <p>Public exhibition, where this is considered to be in the community interest &amp; has not been undertaken by the applicant.</p> |
| <p>Minor Applications.</p> <p>Applications not classified as Major, including:<br/>Householder applications;<br/>Changes of Use;<br/>Telecommunication Applications;<br/>Advertisement Applications and Works to TPO<br/>Trees Applications.</p> | <p>Pre Application</p> | <p>Pre-application discussions with Council officers.</p> <p>Good practice would be to consult with neighbours prior to submitting an application.</p> <p>Measures to meet PPG 8 (para 10 &amp; 11) requirements concerning pre-application discussions on telecommunications applications.</p> | <p>General advice, by phone and in person at the Council's main office.</p>   |
|  | <p>Application</p>     | <p>In addition to any statutory requirements (design &amp; access statements, serving notice on site owners etc.) applicants to submit a statement outlining the methods and results of pre-application consultation.</p>   | <p>Site notice(s) in a prominent location(s)<sup>4</sup></p> <p>Consultation letters to neighbours considered to be materially affected by the proposals.</p> <p>Consultation letters to statutory consultees and other individuals/ organisations considered to be materially affected by the proposals.</p>   |

|   |                        |  |  |
|---|------------------------|--|--|
| <p>Minor Applications<br/>cont/d.</p>                   |                        |  | <p>Inclusion in the Public Notices of the local paper if the application is considered to be of particular public interest.</p> <p>Inclusion in the weekly list of planning applications (available by subscription and at <a href="http://www.south-norfolk.gov.uk">www.south-norfolk.gov.uk</a>)<sup>3</sup></p> <p>Application available for inspection at <a href="http://www.south-norfolk.gov.uk">www.south-norfolk.gov.uk</a> and at the Council's main office – including facility to submit comments via the website<sup>5</sup>.</p> |
| <p>Listed Building &amp; Conservation Area Consents</p> | <p>Pre Application</p> | <p>Pre application discussions with the Council, including seeking specialist advice from the Design, Conservation &amp; Landscape Team.</p> <p>Good practice would be to consult with neighbours prior to submitting an application.</p> <p>For some more significant proposals applicants may wish to consider consulting with a wider group of stakeholders, such as conservation and amenity bodies.</p> | <p>General advice, by phone and in person at the Council's main office.</p>  |
|   | <p>Application</p>     |  | <p>Site notice(s) in a prominent location(s)</p> <p>Consultation letters to neighbours considered to be materially affected by the proposals.</p>  |

<sup>4</sup> Excludes Works to TPO Trees Applications.

<sup>5</sup> Works to TPO Trees Applications from Spring 2007.

|  |  |  |   |
|--|--|--|---|
| <p>Listed Building &amp; Conservation Area Consents cont/d</p> |  |  | <p>Consultation letters to statutory consultees and other individuals/ organisations considered to be materially affected by the proposals.</p> <p>Inclusion in the Public Notices of the local paper.</p> <p>Inclusion in the weekly list of planning applications (available by subscription and at <a href="http://www.south-norfolk.gov.uk">www.south-norfolk.gov.uk</a>)</p> <p>Application available for inspection at <a href="http://www.south-norfolk.gov.uk">www.south-norfolk.gov.uk</a> and at the Council's main office – including facility to submit comments via the website.</p> |
|--|--|--|---|