

## Statement of Community Involvement (SCI) – Consultation Update

Date: 12<sup>th</sup> July 2022

Report of: Chief Planning Officer

Report to: Development Plan Panel

Will the decision be open for call in?  Yes  No

Does the report contain confidential or exempt information?  Yes  No

### Brief summary

At the 1<sup>st</sup> March 2022 Development Plan Panel (DPP) meeting the draft Statement of Community Involvement (SCI) was agreed for its second consultation, to take place during March and April 2022.

The majority of the 6-week consultation took place online, but several different methods were used to publicise the consultation aimed at making the best use of existing networks and encouraging new networks to be established. A total of 47 representations were received and these are summarised in **Appendix 2**.

The comments received on the draft document were broadly positive, however concerns were raised about plain English, technical language and the implementation of the SCI.

As a result of the consultation, further efforts will be made to make the document more readable, less technical language will be used where possible and further clarity will be provided on monitoring and review of consultation and engagement activity. A copy of the current draft SCI can be found in **Appendix 1**.

Inclusive and effective consultation and engagement activity is important for all aspects of the Best Council Plan, helping to deliver better outcomes for all.

### Recommendations

- a) Note the contents of the report, the representations received and the suggested improvements to the draft SCI, prior to approval by the Chief Planning Officer.

### What is this report about?

- 1 The Statement of Community Involvement is a statutory document (required under the Planning and Compulsory Purchase Act 2004) and sets out how residents and other stakeholders can get involved in the preparation of planning policies, frameworks and the

neighbourhood planning process and how comments can be made on planning applications.

- 2 The existing SCI was adopted in 2007 and has supported the preparation of five Development Plan Documents, including the Core Strategy and Site Allocations Plan. The adoption of a new SCI for Leeds presents an opportunity to ensure that the planning service is leading on wider city ambitions around inclusion and diversity. A new, accessible and responsive document will help to provide a planning service that is both effective and responsive to the diverse needs across the District and to provide clarity on how other stakeholders can play their part too.

### **What impact will this proposal have?**

- 3 The SCI will help to make it easier for anyone wishing to take part in consultation and engagement activity on the preparation of Development Plan Documents, to get involved in Neighbourhood Planning activities or submit comments on planning applications.

### **How does this proposal impact the three pillars of the Best City Ambition?**

Health and Wellbeing

Inclusive Growth

Zero Carbon

- 4 The revised SCI will support Inclusive Growth by aiding meaningful community collaboration which can help to identify those neighbourhoods lacking in certain types of housing, employment opportunities, retail provision, community facilities and open space which can in turn influence what sort of development is encouraged and supported in that area. This means that the right sort of development should take place in those areas that need it most, improving sustainability across the District.
- 5 Health & Wellbeing can be addressed through supporting engagement to those neighbourhoods where improvements to green space, community facilities and active travel infrastructure are needed, working towards prioritising appropriate developments in those areas to the direct benefit of the health and wellbeing of those communities.
- 6 By ensuring that we have a clear and robust framework for open and informative consultation and engagement on planning matters, we can facilitate participation that is valued, accessible and inclusive and can be an investment for the planning service in the future.
- 7 The introduction of 'targets' to assist with monitoring and review of the SCI could help with issues around trust and collaboration and encourage more people to not only take part in consultation and engagement, but to do so again.
- 8 The revised SCI will help us to better work with communities to improve physical and social infrastructure in a sustainable way in line with the aims of the declared Climate Emergency priority. We can support communities to look at the impacts of Climate Change on their areas and how to mitigate these impacts and improve resilience through the Neighbourhood Planning process, and by being transparent with options and giving people an opportunity to give us their views at an early stage we can maximise support for new sustainable and/or emission-reducing initiatives which may require behaviour change by residents and businesses.

## What consultation and engagement has taken place?

Wards affected:

Have ward members been consulted?

Yes

No

- 9 Levels of engagement with stakeholders on the SCI has been high and constructive to date. An early 'soft market' exercise helped lay the foundations to form the 'SCI Engagement Group' and this group assisted in advising on what the new SCI should look like and in the consultation in 2019.
- 10 Responses to the 2019 SCI scoping consultation were received from a total of 48 respondents. This included responses from a variety of Parish and Town Councils, Neighbourhood Forums, Community and Residents Associations, Action Groups, interest groups and forums and 17 individual residents from across the Leeds Metropolitan District.
- 11 Respondents were asked a variety of questions during the consultation including what planning matters are important to them, their experiences regarding commenting on planning applications and planning policy documents and any involvement with neighbourhood planning.
- 12 The current consultation took place for a period of 6 weeks between 8th March and 19th April 2022. There was a dedicated webpage [LINK](#) with a link to an accessible html version of the consultation draft SCI and a direct link to a short Smart Survey. Comments could also be made by post, by email or over the telephone. A paper copy of the document was placed on deposit at Merrion House.
- 13 The following methods were used to publicise the consultation, including:
  - A banner advert on all Planning Services web pages.
  - Email notifications to all Ward Members, Neighbourhood Forums and Town/Parish Councils, members of the consultation database the SCI Engagement Group and all who commented on the 2019 scoping consultation.
  - A social media campaign, reaching 15,000 accounts via the social posts.
  - An email notification to a wide range of community representatives, the Equality Hub and Community Committees with a request that it was forwarded on to their members.
  - Electronic 'posters' were sent via email to encourage wider circulation and ease of understanding.
  - The consultation was highlighted to several in-person neighbourhood planning meetings
  - Updates were provided at neighbourhood planning meetings held during the consultation period.
- 14 The Smart Survey questionnaire included 8 questions and provided an opportunity to make comments quickly and easily on any aspect of the draft SCI and to make suggestions on how it could be improved. Respondents were also asked to select what they considered to be the most useful methods of engagement from a list of both online and offline methods, and to comment on the idea of 'targets' to help monitor and improve future consultation and engagement activity. A total of 47 complete representations were received, made up of 8 emails and 39 smart survey forms. Responses were received from statutory bodies, neighbourhood planning forums and Town/Parish Councils, community groups, a civic society, an investment firm and several individual residents. A table containing the key comments made is included in **Appendix 2**.

15 The feedback received on the draft document was generally positive and with helpful suggestions for improvement. Figure 1 below shows the data for people's views on the format of the draft. Other comments were raised on consultation and engagement activity more generally. The following supportive comments were received:

- The document is informative and inclusive.
- The use of links means that people can find out more detail about subjects without the SCI itself being overly long.
- Agree with/support the Consultation Principles.
- Appreciate the structure and layout of the document.
- The Council's support for Neighbourhood Planning groups is acknowledged as exemplary.
- The 'targets for success' are a good proposal.

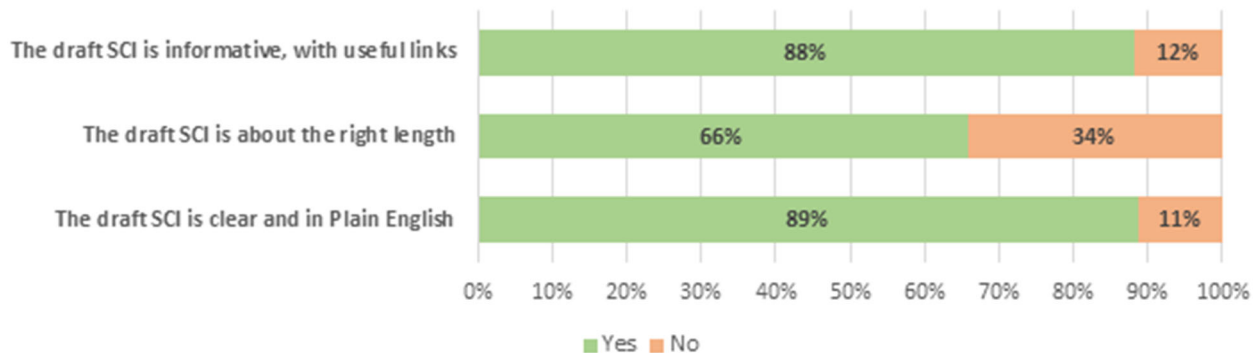


Fig 1. Q2. We would like to hear your views on the format of the draft.

16 The following comments that raised an issue with the document were received:

- Concern that draft is too long and there is still too much technical jargon and 'planner speak'.
- A summary version would be useful to give choice, along with more pictures/diagrams to make the document clearer and easier to read.
- The Statement of Community Involvement should be a cross-Council document and that the engagement principles should be used by all departments, not just Planning Services, to ensure consistency in consultation and engagement across the Council.
- Concern was raised that there is little trust in the planning system, and that care needs to be taken to ensure that the document is not just aspirational, but that the principles are consistently applied.

17 The following comments that raised an issue related to consultation and engagement activity more generally or made suggestions for improvement were received. Figure 2 shows people's preferred methods of consultation and engagement.

- There should be more engagement with young people.
- Increased use of poster adverts in supermarkets, community notice boards, GPs and leisure centres
- More radio adverts
- Subtitled videos
- The use of Public Panels
- Improvements to Public Access, including clear guidelines on what can and cannot be influenced on planning applications
- More face-to-face consultations
- An easier and quicker Neighbourhood Planning process
- Promote final SCI and actively engage with communities about what it is and what it does
- Better links between planning and enforcement
- Use Ward Members, Residents Associations and Town/Parish Councils etc. to cascade messages to communities.

- Possible target - Measure success by using metrics to monitor the reach of communications to communities. Could use specific target figures (i.e. % of population)
- Possible target – Reaction from communities to schemes once implemented i.e. did comments result in an improved scheme/less harm?

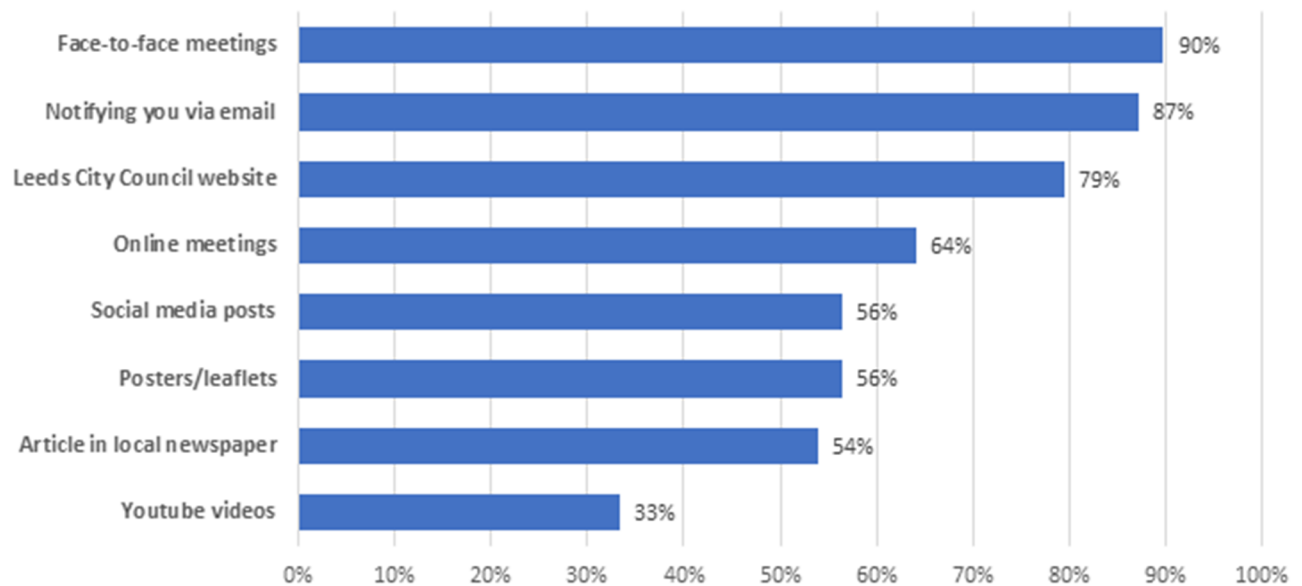


Fig 2. Q7. We regularly review the methods we use to consult and engage, to ensure we are as effective as we can be. Please let us know which of the following you think are effective methods to engage (select as many as you wish).

18 In response to the comments received the following improvements to the SCI will be made (this list is not exhaustive at this stage):

- A summary version of the SCI will be created.
- We will make available a pdf version of the SCI which will be produced with support from Creative Services to make it visually engaging, using pictures, diagrams, graphs, logos, colour-blocking etc.
- We will carry out a Plain English check, with assistance from independent and non-planner colleagues. This process has been started but will continue post-DPP as we finalise the draft.
- We are revisiting the document to consider where we can re-word/reduce the word count without losing essential content.
- We will check all links within the document to ensure that they work, and that they lead to further information that is both useful and easy to understand.
- We will amend descriptions of specific Neighbourhood Planning and Development Management processes where further clarification is required.
- We will say more about monitoring to provide assurances and improve trust.
- We have used the general and specific feedback provided to help us draft 3 targets, and how we will achieve them.

19 There will be a commitment to improving youth engagement in planning, with a new target requiring the inclusion of a specific method for youth engagement or some sort of targeting, for every planning consultation. In further response to the comments received the following points are noted:

- The SCI sets a statutory minimum level of consultation so the Council will be obliged to carry consultation out to that standard in each plan making process or decision-taking process.
- The SCI is a statutory requirement for consultation on planning matters and therefore cannot be applied to other departments across the Council who have different statutory requirements and processes for consultation.
- Whilst it is acknowledged that poster adverts in a large number of locations is an effective way of reaching people, for a city the size and scale of Leeds this would not

be something that could be set down as a minimum that the Council could realistically achieve for each DPD given available resources and cost pressures. However, the SCI does note that for particular DPDs or plans it may be necessary to have more promotion locally e.g. posters/leaflets in libraries and community hubs.

- Similarly, for significant planning consultation such as reviews of the Core Strategy it may be appropriate to pay for radio adverts, but these would not be cost effective for every DPD, particularly given the reach of social media.
- The use of Public Panels will be considered, depending on the type and scale of the consultation.
- We will investigate promoting clear guidelines on what can and cannot be influenced on planning applications on the Council website.

20 The targets that we think are both beneficial and measurable at this stage are:

- 1) We will receive responses from every neighbourhood on district-wide plan-making consultations.
  - We will seek to achieve this by targeting promotions within neighbourhoods, piggybacking on events within neighbourhoods and close working with locality teams and Community Committees.
- 2) We will increase the positive feedback received on the accessibility and clarity of consultation from all groups, particularly from those rarely engaged in planning.
  - We will seek to achieve this by carrying out plain-English checks, having summary versions of consultation material, clarity on what can and cannot be influenced from the consultation and a focus on priority neighbourhoods
- 3) We will ensure that young people feel engaged and included in planning consultations and have been able to make their views known in a way that that is easy, accessible and fun.
  - We will seek to achieve this by working with Children's Services on a Youth Engagement Strategy to involve the Youth Council, Youth Ambassadors, schools, colleges and youth groups. This may involve workshops, the use of videos, social media/apps and newsletters/bulletins via the City's youth network.

### **What are the resource implications?**

21 Revising the SCI does not commit the Council to additional expenditure, but any additional consultation activities may lead to pressure on resources and existing staff. A key consideration is how digital technology and electronic communication can be used to reduce costs, and we are also putting into practice using in-house expertise and existing networks to make our consultation and engagement material and resources as engaging as possible and maximising reach.

22 It is anticipated that any costs to the Council associated with community involvement will be met from within existing provision. However, it should be recognised that the more extensive the consultation practices that are prescribed as standard in the SCI prescribes, the more consultation costs are likely to increase. It is therefore important to maintain a balance between resources and consultation activities. The expectation is that the revised SCI will also encourage developers to embed consultation and engagement as standard practice and where possible for this to be front loaded.

### **What are the key risks and how are they being managed?**

23 The revised SCI will seek to balance the increased expectations of local communities with the need for an efficient and effective planning system. This will mean ensuring that once adopted, the Council complies with all the commitments made. The introduction of 'targets'

will be a useful way to manage risk and to monitor activity, and an assessment of these will be included as part of the Council's annual Authority Monitoring Report (AMR).

### **What are the legal implications?**

- 24 Section 18 of the Planning and Compulsory Purchase Act 2004 requires that a Local Planning Authority must prepare a Statement of Community Involvement.
- 25 The SCI was originally a document that was required to be approved by Full Council and subjected to independent examination. The law has since changed, and the Chief Planning Officer now has delegated authority to adopt the statement.

### **Options, timescales and measuring success**

#### **What other options were considered?**

- 26 The preparation and adoption of an SCI is a statutory requirement. The approach taken in the draft documents sets out a meaningful and serious approach to increase consultation and engagement activity in every neighbourhood in Leeds. Whilst there was no requirement to consult on the draft SCI document itself, it was felt this was an important step to ensure that the approach proposed is supported by communities and that the document itself was easy to navigate and engage with.

#### **How will success be measured?**

- 27 Compliance with the revised SCI should increase public engagement in Planning matters from communities across the District.
- 28 The revised SCI also sets out an opportunity to introduce a series of specific 'targets' to assist in monitoring and review, and an assessment of these will be published in the AMR. In addition to this, the satisfaction levels of individual consultation and engagement activities will be covered in a 'Consultation Report' for local plan making and a 'Consultation Statement' for neighbourhood planning.

#### **What is the timetable and who will be responsible for implementation?**

- 29 Following the revision of the current draft, considering representations received during the consultation and any comments from Members, it is anticipated that the final document will be adopted by August 2022.

### **Appendices**

Appendix 1 – Current draft Statement of Community Involvement

Appendix 2 – Summary of representations received.

### **Background papers**

None