

Appendix 2: Statement of Consultation



Greater Cambridge Statement of Community Involvement

Statement of Consultation

Background

The Council as the Local Planning Authority has prepared a Statement of Community Involvement (SCI). The purpose of the SCI is to set out how Cambridge City Council and South Cambridgeshire District Councils will consult on planning policy documents, planning applications and advise and support the preparation of neighbourhood plans. The methods of consultation and publicity set out in the SCI will set the minimum standards that the councils' will apply when fulfilling their statutory duties.

The SCI is structured in six chapters:

- Chapter 1 provides an introduction to the SCI, setting out why a new SCI has been prepared and a general overview of the planning system.
- Chapter 2 sets out how the local community can participate in the planning process.
- Chapter 3 explains in detail how the community can engage in the plan making process, including setting out how the councils will consult on planning policy documents including Local Plans, Supplementary Planning Documents and Neighbourhood Plans.
- Chapter 4 explains the development management process and how the community can engage throughout the process, including how to submit representations when an application is being consulted on and speaking at Planning Committee.
- Chapter 5 provides a high level overview of how the councils will provide advice and support for neighbourhood planning.
- Chapter 6 identifies how the councils will monitor and review public engagement related to planning

Consultation on the Statement of Community Involvement

The SCI was approved for public consultation at the Planning and Transport Scrutiny Committee on 15 January 2019. It was also approved for public consultation at Cabinet on 9 January 2019 at South Cambridgeshire District Council.

The consultation on the draft SCI took place for six weeks from Monday 11 February to Monday 25 March 2019.

The Council has consulted widely on the SCI in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) via email or post where no email address is available. This has included the Specific Consultation Bodies¹,

¹ Specific consultation bodies and duty to cooperate bodies required under the Town and Country Planning (Local Planning) (England) Regulations 2012 as amended

other Local Authorities, Community Organisations including Parish Councils and Residents' Associations, developers and agents, and a range of other national, regional and local organisations, and other individuals with a stated interest in the area or local to the area.

Other methods of notification include:

- a public notice in the Cambridge News;
- through the councils webpages <https://www.cambridge.gov.uk/consultations/greater-cambridge-statement-of-community-involvement-consultation> and <https://www.scambs.gov.uk/planning/local-plan-and-neighbourhood-planning/statement-of-community-involvement/>.

Consultation Methodology

A six-week consultation period for the SCI took place from:

9am on 11 February 2019 to 5pm on 25 March 2019

The draft SCI was made available for inspection at the following locations:

- online on the Council's website <https://www.cambridge.gov.uk/consultations/greater-cambridge-statement-of-community-involvement-consultation>
- at the Council's Customer Service Centre at Mandela House, 4 Regent Street, Cambridge, CB2 1BY from 9.00am-5.15pm Monday to Friday
- at South Cambridgeshire District Council, South Cambridgeshire Hall, Cambourne Business Park, Cambourne, Cambridge, CB23 6EA

Comments could be made using:

- the online consultation system <http://cambridge.jdi-consult.net/localplan/> or;
- the electronic or printed response form which could be downloaded and filled in electronically by visiting website <https://www.cambridge.gov.uk/consultations/greater-cambridge-statement-of-community-involvement-consultation>

Completed forms could be returned to:

- Planning Policy, Cambridge City Council, PO Box 700, Cambridge, CB1 0JH
- Planning Policy, South Cambridgeshire District Council, South Cambridgeshire Hall, Cambourne Business Park, Cambourne, Cambridge, CB23 6EA
- Emailed to policysurveys@cambridge.gov.uk
- Or emailed to ldf@scambs.gov.uk

Contact details for further information were also made available as follows:

- Tel: 01223 457200 / 01954 713183

- Email: policysurveys@cambridge.gov.uk / ldf@scambs.gov.uk

Next steps

After the close of consultation, the key issues raised were considered by the Council and changes were made to the SCI, where appropriate. These are set out below.

Summary tables of main issues raised, Council assessment and proposed modifications

Statement of our intention to engage with our communities				
Representations Received	Support: 0	Object: 0	Comment: 0	Total: 0
Main Issues in reps:	None			

1.0 Introduction				
Representations Received	Support: 1	Object: 0	Comment: 2	Total: 3
Main Issues in reps:	<p>Two 'no comment' responses.</p> <p>Historic England (HE) support general aims and approach of the draft SCI. HE welcome acknowledgement of Historic England as a statutory consultee.</p> <p>With regards to neighbourhood planning they would welcome notification of proposed neighbourhood planning areas as well as consultation on draft plans. The regulations state that Historic England should be consulted where interests could be affected. Historic England would welcome consultation at informal level in addition to requirements of legislation, where issues may benefit from early involvement.</p>			
Council's Assessment	<p>General support is noted and welcomed.</p> <p>In South Cambridgeshire, where a neighbourhood plan area aligns with a parish council boundary, no consultation is undertaken on the designation of the neighbourhood plan area as per the requirements of The Neighbourhood Planning (General) and Development Management Procedure (Amendment) Regulations 2016. Nevertheless where a neighbourhood area application does not align with a parish boundary or is within Cambridge City, the relevant LPA will consult on the area boundary and notify the statutory bodies of the consultation.</p> <p>The councils have a Neighbourhood Planning Support Offer in place which outlines the advice and support available from the councils' to neighbourhood forums and parish councils who are preparing a</p>			

	neighbourhood plan. Where relevant, the councils' will provide advice on the relevant statutory and key consultees' forums and parishes could engage with in preparing their neighbourhood plans. This may include Historic England and other key consultees such as Sport England.
Proposed Modifications	No proposed modifications.

2.0 How can I get involved in the planning process?				
Representations Received	Support: 0	Object: 3	Comment: 0	Total: 3
Main Issues in reps:	<p>Links to other City Council webpages contain out of date information and there must be more ways for local communities to engage in planning than what is stated in the SCI.</p> <p>The SCI does not appear to make clear how members of the public can respond to applications. People can be uncertain how to do this, and put off by the process. Community engagement is important so people need to see easily how to comment, and if it goes to the planning committee, how to speak at it.</p> <p>This consultation is nonsense as it 'calls a spade a spade' and it is not clear what information/feedback is required.</p> <p>IDOX is very hard and slow to use. It is very user-unfriendly for members of the public, thus may disenfranchise many people.</p>			
Council's Assessment	<p>The outdated Resident Association Forum webpage on the Cambridge City Council website is noted and this has been reviewed and updated.</p> <p>Whilst there are a number of ways for residents to get involved in the planning process, this particular chapter sets out how people can actively engage in planning matters with the councils as Local Planning Authorities. This includes various forums and committees as set out in Section 2.0 of the SCI. Nevertheless there are also other ways for people to get involved in planning, including joining local resident and campaign groups such as resident associations, lobby organisations and other societies. The list of local groups is extensive in Greater Cambridgeshire and it is not the role of the SCI to identify them. The SCI, in particular Section 2.0, sets out how people can engage with the council in a formal capacity including</p>			

	<p>during the plan making process (section 3.0), planning application stage (section 4.0) and through the neighbourhood planning process (section 5.0).</p> <p>Section 4.0 of the SCI sets out the planning application process, how people can respond to planning applications and how decisions are made, including how members of the public can speak at Planning Committees. Nevertheless it is agreed that a link to the two councils' online consultation platforms would be helpful in signposting people to the correct webpages.</p> <p>As set out in the introduction to the SCI, the councils' are required to prepare a Statement of Community Involvement to meet our legal requirements on how we will undertake public consultation on local plans, neighbourhood plans and planning applications. This updated SCI has also been prepared to reflect current planning legislation and the formation of the Greater Cambridge Shared Planning Service.</p> <p>The representation regarding Idox (Public Access) has been addressed under 'Involving the Community at the Planning Application Stage'.</p>
<p>Proposed Modifications</p>	<p>Insert the following wording to the end of paragraph 4.9</p> <p>'Planning applications, supporting information and key dates are available for public inspection online²³.'</p> <p>Insert the following footnote</p> <p>²³ South Cambridgeshire: https://www.scambs.gov.uk/planning/view-or-comment-on-a-planning-application/ Cambridge City: https://www.cambridge.gov.uk/planning-applications</p>

3.0 Involving the Community in Planning Policy				
Representations Received	Support: 0	Object: 0	Comment: 0	Total: 0
Main Issues in reps:	None			

4.0 Involving the Community at the Planning Application Stage				
Representations Received	Support: 0	Object: 3	Comment: 0	Total: 3
Main Issues in reps:	<p>IDOX (Public Access) is not an intuitive, modern tool for many members of the public to use. For this reason it excludes too many who might wish to comment on planning applications and remains challenging for those who already do.</p>			
Council's Assessment	<p>The issues regarding IDOX to view and comments on planning applications are noted.</p> <p>The Councils have, as part of the Shared Planning Service, agreed to use IDOX as its preferred planning application online platform. This decision was taken following an independent review into the two consultation software that the two councils currently use, IDOX and APAS.</p> <p>The councils' have previously raised the issues relating to URL's to IDOX on the IDOX Ideas Page. This feature is where councils can suggest changes to the systems for IDOX to consider in further detail, subject to it being voted on by other local planning authorities. On previous occasions, where the councils' have suggested changes to URL's, they have not been supported by other local planning authorities on the ideas page and subsequently by IDOX. Nevertheless the councils will continue to engage with IDOX to see if URL's can be amended so they improve user functionality.</p> <p>The speed at which information is displayed and documents are opened within IDOX is based on a range of factors, including internet speeds, the technical specifications of individual computers and/or mobile devices as well as the file sizes. Whilst these particular issues are outside of the councils' control, the councils' will generally split large documents, such as a Design and Access Statement, when they exceed 50 pages or 10MB in file size to assist users with downloading and viewing large files.</p> <p>The councils' name the documents according to the document submitted by the applicant. This is to assist the Planning Officer and consultees when considering the supporting documents that accompany a planning application. A number of the document names are prescribed by planning legislation, for example the term Design and Access Statement is taken from the Town and Country Planning (Development Management Procedure) (England) Order 2015 (as amended). However the councils' will look further at</p>			

creating a glossary of documents to place on its websites which can provide further information explaining what some of these documents might contain to make it easier for people to understand the terminology.

The search functionality is a set feature within the software. In order for this to change and/or improved, this would need to be supported on the IDOX Ideas Page (see response above). It should be noted that users can search for specific properties using the map functionality. The map is updated on a regular basis to reflect current and historic planning applications, planning appeals and building control records. There is also the option to search for planning and building control applications within the map based on a specific timeframe, e.g. within the last six months.

In addition to searching for 'live' planning applications, IDOX also allows users to generate a report of weekly and monthly planning applications validated or decided within a specific week or month.

The dates shown refer to the different notifications sent out by the councils and the different publicity methods that the individual councils are required to undertake according to planning legislation. The councils' intentions are to align consultation dates where possible.

Regarding some of the terminology used to describe the dates shown in IDOX, they are defined as follows:

- 'Standard Consultation Date' refers to the date consultees were consulted on the application
- 'Neighbour Consultation Expiry Date' refers to the deadline for neighbours to submit any representations on the application

Whilst there are multiple dates shown under each specific planning application, this is to reflect some of the statutory requirements of planning regulations and also to allow the councils to alter dates where planning applications are amended during the consultation period and/or where there has been an agreed extension of time to determine the application with the applicant. It should be noted that applications are open to comments until the 'Agreed Expiry Date'. To clarify this issue regarding dates further, the councils' will update the frequently asked questions on its websites to include further

	<p>detail and clarification.</p> <p>All files should be in Microsoft Word or PDF format which also includes emails. Historically emails were added to specific planning applications as .eml files but this practice was amended several years ago to overcome the issues noted in the representations. The councils will remind officers of this to ensure the correct procedures are followed for future applications.</p> <p>Details of where the committee is being held, and on what date and time, can be found on the letter sent out to the agent or applicant and people who have submitted representations on the application. This is uploaded to the documents tab within IDOX. Unfortunately there is not a field available for this information to be stored on Public Access. Members of the public who are tracking an application will be made aware of the letter being uploaded. Further details can also be found on the Planning Committee's website. The officer's report and the amendment sheet/de-brief are added into IDOX. Minutes of the committee are found on the relevant Planning Committee webpages (Cambridge City Council / South Cambridgeshire District Council).</p> <p>Section 106 documents are added to the website once completed. Historically they were not added but the councils have been organising a project to upload them so most applications should now have these available to view.</p> <p>Regarding the representation about the lack of a data feed, this is not something that either the existing Cambridge City Council or future South Cambridgeshire District Council IDOX systems produce. Nevertheless the councils will consider how we can share this open data more widely in an accessible format.</p> <p>Whilst the councils are aware of some of the issues raised in the representations regarding the online planning application platform, both councils' will continue to work with the software provider in seeking improvements to the way people access, navigate and view documents within the system.</p>
<p>Proposed Modifications</p>	<p>No proposed modifications.</p>

5.0 How the community can prepare a Neighbourhood Plan or Order				
Representations Received	Support: 0	Object: 0	Comment: 0	Total: 0
Main Issues in reps:	None			

6.0 Monitoring and Review				
Representations Received	Support: 0	Object: 0	Comment: 0	Total: 0
Main Issues in reps:	None			

Appendix 1 - 5				
Representations Received	Support: 0	Object: 1	Comment: 0	Total: 1
Main Issues in reps:	<p>No mention in draft consultation regarding involvement of schools. This is a grievous omission considerably impacting on viability and sustainability of communities as well as quality of life for Greater Cambridgeshire residents. Involvement of schools and educational establishments at all points of the planning process must be considered to comply with equalities legislation (Equalities Act 2010).</p> <p>NPPF places considerable weight on educational issues(inter alia para 94) this has not been acknowledged in policies by the Greater Cambridge Partnership.</p> <p>Current SCDC Planning Policy uses existence of Primary Schools to denote Group Village status yet has no mechanism to support them which is contrary to NPPF guidelines. There appears to be no mechanism for assessing the impact of Local Plans on communities.</p> <p>We are keen to engage with Greater Cambridgeshire Partnership to ensure that schools continue to thrive. Current flows of information are not fit for purpose and no substitute for direct consultation with schools.</p>			
Council's Assessment	The councils agree that it is important to engage with local communities through the plan making process. Residents, businesses and other interested organisations, such as educational			

	<p>institutions, are able to sign up for planning policy notifications. This includes notifications on public consultations and the adoption of planning policy documents. More information on how to sign up for these notifications can be found on the councils' websites.</p> <p>Notifications of specific planning applications that fall within close proximity to an educational institution will be consistent with the method of publicity set out in Table 4 of the SCI. It is also possible to register for planning application notifications within Cambridge City and this feature will also be available in South Cambridgeshire from December 2019.</p> <p>Planning application notifications allow the user to receive notifications of applications that fall within a certain area which can then be tracked by the user. Residents, businesses and other organisations and interested parties are encouraged to use this notification system to ensure they are kept aware of development proposals in their areas of interest.</p> <p>As part of the councils' responsibilities, there is regular engagement with statutory bodies, such as Cambridgeshire County Council who are the local education authority for the area. This engagement includes identifying and responding to education issues in preparing planning policy documents such as a Local Plan and consulting them on planning applications, where education capacity and potentially funding towards school provision are considered prior to a decision being made on a particular application.</p>
Proposed Modifications	No proposed modifications.

Summary table of additional proposed minor modifications

Paragraph / Section	Proposed modification
Statement of our intention to engage with our communities	<p>Amend the paragraph to read as follows:</p> <p>We would encourage you, as residents and stakeholders (including Parish Councils and Residents' Associations as appropriate groups and associations representing residents and businesses in the area.), to use this Statement of Community Involvement and the protocols set out within it, to hold the Authorities to account and ensure that all local people have sufficient opportunities</p>

	to have their say.
Paragraph 1.16	<p>Insert footnote to explain community groups in the context of neighbourhood planning.</p> <p>² Where a community wants to take up the opportunities offered by neighbourhood planning, the legislation enables three types of organisations known as qualifying bodies to lead it. These are either a parish or town council; a neighbourhood forum; or a community organisation within a non-parished area.</p>
2.5	Reference to South Fringe Community Forum removed as the last meeting will take place in June 2019.
Table 1: Local Plan preparation	<p>Text deleted for consistency with Table 2.</p> <p>Public consultation events if appropriate to the nature of the consultation. These may include public exhibitions and open day events.</p>
3.17	<p>Insert the following text to the end of the paragraph:</p> <p>and include Neighbourhood Forums.</p>
3.18	<p>Amend the paragraph to read as follows:</p> <p>The council is required to co-operate with neighbouring local planning authorities and other prescribed bodies on strategic matters that cross administrative boundaries under the statutory 'duty to co-operate'. Whilst Local Nature Partnerships (LNP) are not subject to the requirements of the duty, the councils' are committed to cooperating with the LNP (Natural Cambridgeshire) and have regard to their activities which are relevant to local plan making. The LNP acts as an independent, objective voice for the natural environment in Cambridgeshire and Peterborough and part of its role is to coordinate partners to deliver projects and activity that will meet the Partnership's vision and aims. These bodies identified under the statutory 'duty to co-operate' are also listed in Appendix 1.</p>

Appendix 1

Insert the following text to the end of the Appendix:

The Local Nature Partnership for Cambridgeshire and Peterborough is Natural Cambridgeshire. The role of Natural Cambridgeshire is to act as an independent, objective voice for the Natural Environment in Cambridgeshire & Peterborough, acting as a conduit to local and central government and other stakeholders. The main focus for the Natural Cambridgeshire Board will be to provide strategic leadership, coordinating partners to deliver projects and activity that will meet the Partnership's vision and aims. More information regarding Natural Cambridgeshire is available on their website.