

**INSPECTOR'S REPORT**  
**SUFFOLK COASTAL DISTRICT COUNCIL**  
**STATEMENT OF COMMUNITY INVOLVEMENT**

Inspector: Keith Holland BA(Hons) Dip TP MRTPI ARICS

Date: 30 May 2006

## **Suffolk Coastal District Council Statement of Community Involvement (February 2006)**

### **INSPECTOR'S REPORT**

#### **Introduction**

- 1.1 An independent examination of the Suffolk Coastal District Council Statement of Community Involvement (SCI) has been carried out in accordance with Section 20 of the Planning and Compulsory Purchase Act 2004. Following paragraph 3.10 of Planning Policy Statement 12: Local Development Frameworks, the examination has been based on the 9 tests set out (see Appendix A). The starting point for the assessment is that the SCI is sound. Accordingly changes are made in this binding report only where there is clear need in the light of tests in PPS12.
- 1.2 A total of 18 representations were received all of which have been considered. The Council proposed a number of amendments to the SCI in response to representations received, and these have been taken into account in the preparation of this report. Further information was requested from the Council in relation to Tests iv, v and vi and this information is contained in Appendix B to this Report.

#### **Test 1**

- 2.1 The Council has undertaken the consultation required under Regulations 25, 26 and 28 of the Town and Country Planning (Local Development) (England) Regulations 2004.
- 2.2 This test is met.

#### **Test 2**

- 3.1 Section 10 of the SCI acknowledges that the LDF is a way of delivering the aims of the Community Strategy, and states that the Council will work with the Local Strategic Partnership to make sure that the content of the two documents complement each other and to avoid duplicating consultation exercises. The SCI also makes reference to other community strategies (Paragraph 10.1), such as Parish / Community Plans, and states that consideration will be given to how these will be linked in terms of objectives and consultation.
- 3.2 This test is met.

### **Test 3**

- 4.1 The Council has set out in Appendix 2 of the SCI those groups which will be consulted. This list includes the statutory bodies from PPS12 Annex E. It is stated at Paragraph 7.04 of the SCI that the Council holds a database of consultee details and that this is kept under review. Furthermore, the Council state in this paragraph that they will consult with additional local stakeholders where appropriate.
- 4.2 A number of objectors request inclusion as consultees through inclusion in the lists contained at Appendix 2. These lists can never be final and definitive and I am content that these concerns are overcome by cross referencing the electronic database described at Paragraph 7.04 to the specific lists in Appendix 2.
- (R1)** Insert the following to the end of Paragraph 7.04:
- “These database entries include those which represent the categories of consultee identified at Appendix 2.”
- 4.3 Subject to the recommendation above this test is met.

### **Test 4**

- 5.1 The table within Paragraph 12.01 explains that the Council will involve and inform people from the early stages of LDD preparation and Paragraph 8.03 describes the range of methods the Council will employ to do this. The table within Paragraph 12.01 explains that informal consultation will take place with the key stakeholders such as parish councils and local developers, at the issues and options stage of DPD production in accordance with Regulation 25.
- 5.2 Although this table has been amended by the Council as a result of representations received, the Council have, however, failed to identify the stage within the DPD process that deals with alternative sites, if the DPD is concerned with allocations of land. The Council were asked to address this issue and I recommend accordingly.
- (R2)** Insert the revised table into Paragraph 12.01. This table is given within Appendix B to this report.
- 5.3 As a result, I am satisfied that the consultation proposed will be undertaken in a timely and accessible manner.
- 5.4 Subject to the recommendation above, this test is met.

## **Test 5**

- 6.1** Paragraph 8.03 sets out the methods that the Council propose to use to involve the community and stakeholders. These cover a range of recognised consultation techniques that will present information via a range of different media. The Council indicate in the table within Paragraph 12.01 at what stages of LDD preparation the various methods might be employed.
- 6.2** The SCI acknowledges that the Council may have to provide extra support to facilitate consultation with certain groups or individuals, and proposes (at Paragraph 7.07) how they might do this.
- 6.3** However, the SCI should state how the Council will make their information accessible to all members of society, and should set out how they will meet requirements of the Race Relations Act 2000 and the Disability Discrimination Act 1995. The Council were asked to provide additional text to address this issue and also to provide statements detailing the availability of the SCI and other LDF documents in alternative formats and I recommend accordingly:

**(R3)** Insert a new paragraph after Paragraph 7.03 (subsequent paragraphs should be renumbered accordingly) to read as follows:

“The Council is committed to diversity and social inclusion to ensure that everyone has access to services and is treated fairly. There are key pieces of Government legislation to which the Council will comply. These include:

- Race Relations Act 2000, particularly the need to eliminate unlawful racial discrimination and promote equal opportunities. The main issue within this district will relate to the fact that English may not be the first language
- Disability Discrimination Act 1995 and the need to promote an equal quality of service. Issues here will revolve around physical access to consultations venues and visual impairment.

The means by which the Council will seek to meet the requirements of the above legislation are set out in the schedule following paragraph 7.07. In respect of the availability of documents in appropriate formats the Council will have regard to what is practical and cost effective. The profile of the district (see section 6) shows that ethnic minorities account for an extremely small proportion of the district and the first language of over 98% of the district is English. Therefore, all documents will be published in English and requests for other languages will be considered upon request. With regard to visual impairment, large print editions will be prepared upon request.”

**(R4)** Insert in the space below the title on Page 1 of the SCI the following:

“Requests for this document to be made available in another language, large print, Braille or on audio tape can be submitted to the Council on 01394 383789 or email [development.policy@suffolkcoastal.gov.uk](mailto:development.policy@suffolkcoastal.gov.uk) and the Council will do its utmost to help.”

6.4 As a result I am satisfied that the methods of consultation proposed in the SCI are suitable for the intended audiences and for the different stages in LDD preparation.

6.5 Subject to the recommendations above this test is met.

### **Test 6**

7.1 The Council were asked to provide a brief statement to explain how the Council will seek to ensure that sufficient resources are put in place to achieve the scale of consultation envisaged. This text is given below and I recommend accordingly:

**(R5)** Insert as a new paragraph, Paragraph 8.04 entitled “Resources” the following:

“The Council is fully committed towards community involvement in planning and already exceeds statutory consultation requirements. The Council has considered the financial requirements for community consultation as set out in this document and has made provision for enough financial and other resources to cover the programme of the Local Development Framework. However, forced changes to the Council’s budget could affect the resourcing of the programme and these may need to be taken into account in future reviews of the SCI.”

7.2 As a result I am satisfied that the Council is alert to the resource implications of the SCI.

7.3 Subject to the recommendation above this test is met.

### **Test 7**

8.1 Paragraph 12.02 explains how the results of community involvement will be taken into account by the Council and used to inform decisions. The Council also propose to prepare reports at the end of the consultation period explaining how views have been considered and documents changed in light of the community involvement. However, the SCI should state at the end of Paragraph 12.02 where these will be made publicly available.

**(R6)** Add to the end of Paragraph 12.02 the following:

"All documents produced as part of the Local Development Framework including consultation drafts, will be available from their time of production at the Council's Offices in Woodbridge as well as through the Council's website. Requests for documents to be made available in another language, large print, Braille or on audio tape can be submitted to the Council and it will do its utmost to help."

8.2 Subject to the recommendation above this test is met.

### **Test 8.**

9.1 Section 14 of the SCI explains that the SCI will be formally reviewed after a period of 3 years in accordance with the LDS. In addition Paragraph 14.02 sets out a checklist for evaluating the methods of involvement and consultation exercises and states that feedback forms will be used to evaluate the success or otherwise of consultation activities. This information will be used to refine the Council's approach to community involvement within the three years. It would be helpful if this section made reference to the role of the Annual Monitoring Report and I recommend accordingly.

**(R7)** Insert the following text to the end of Paragraph 14.02:

"The success and effectiveness of the SCI will be reviewed through the Annual Monitoring Report (AMR)."

9.2 Otherwise I am satisfied that the Council has mechanisms for reviewing the SCI and have identified potential triggers for the review of the SCI.

9.3 Subject to the recommendation above this test is met.

### **Test 9**

10.1 The SCI at Section 13 describes the Council's policy for consultation on planning applications. Paragraph 13.01 meets the minimum requirements and Table 1 provides detail of additional methods of consultation. This distinguishes between procedures appropriate to different types and scale of application.

10.2 However, the SCI does not adequately deal with the question of how the results of consultation will be reported and how the results will be used to inform the decision making process.

**(R8)** Add to Paragraph 13.05 the following:

"The results of any such consultation will be reported and taken into account in decisions made by, and on behalf of, the Council."

10.3 Subject to the recommendation above this test is met.

**Conclusions**

11.1 The submission SCI contained sections of text that would become redundant once the document is adopted. The Council were asked to provide a schedule of these editorial changes, the implementation of which I recommend. These are given in Appendix B to this report.

**(R9)** Implement the editorial changes proposed in Appendix B to this report.

11.2 Subject to the implementation of the recommendations above, the Suffolk Coastal District Council SCI (February 2006) is sound.

A handwritten signature in black ink, appearing to read 'KHolland', written in a cursive style.

Keith Holland

Inspector

**APPENDIX A**  
**TESTS OF SOUNDNESS**



### **Examination of the soundness of the statement of community involvement**

3.10 The purpose of the examination is to consider the soundness of the statement of community involvement. The presumption will be that the statement of community involvement is sound unless it is shown to be otherwise as a result of evidence considered at the examination. A hearing will only be necessary where one or more of those making representations wish to be heard (see Annex D). In assessing whether the statement of community involvement is sound, the inspector will determine whether the:

- i. local planning authority has complied with the minimum requirements for consultation as set out in Regulations;<sup>1</sup>
- ii. local planning authority's strategy for community involvement links with other community involvement initiatives e.g. the community strategy;
- iii. statement identifies in general terms which local community groups and other bodies will be consulted;
- iv. statement identifies how the community and other bodies can be involved in a timely and accessible manner;
- v. methods of consultation to be employed are suitable for the intended audience and for the different stages in the preparation of local development documents;
- vi. resources are available to manage community involvement effectively;
- vii. statement shows how the results of community involvement will be fed into the preparation of development plan documents and supplementary planning documents;
- viii. authority has mechanisms for reviewing the statement of community involvement; and
- ix. statement clearly describes the planning authority's policy for consultation on planning applications.

*From:* Planning Policy Statement 12: Local Development Frameworks

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

**APPENDIX B**  
**CORRESPONDENCE**



# The Planning Inspectorate

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Matt Deakin  
Suffolk Coastal District Council  
Melton Hill  
Woodbridge  
Suffolk  
IP12 1AU

Your Ref:  
  
Our Ref: PINS/J3530/429/2  
  
Date: 8<sup>th</sup> May 2006

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## SUFFOLK COASTAL DISTRICT COUNCIL - STATEMENT OF COMMUNITY INVOLVEMENT

Dear Mr.Deakin,

As the appointed Inspector for your Authority's Statement of Community Involvement I am requesting comments from the Council on the following points in order to assist in assessing the soundness of Suffolk Coastal District Council's Statement of Community Involvement.

### Test iv.

It is noted that the Council has already amended the table in Paragraph 12.01 as a result of representations received. However, the table still omits an important stage in the DPD process. Could the Council please add to this amended table the alternate sites stage for when a DPD is concerned with allocations of land. Methods of involvement and who will be involved should also be detailed.

### Test v.

Could the Council please provide a paragraph as an addition to the text box on page 8 of the SCI to explain how the Council proposes to meet the requirements of the Race Relations Act 2000 and the Disability Discrimination Act 1995. This should also explain how the Council will make their information accessible to all members of society.

Additionally, could the Council provide the wording for display on either the front or rear cover of the SCI which advertises the availability of the SCI in alternate formats, and where these will be made available.

Lastly, could the Council provide a similar statement, this time relating to all LDF documents, which should be an addition to Paragraph 5.07.

### Test vi.

Could the Council provide a brief Section which deals with the issues of Resources.

### Editorial changes.



It is noted that there are certain sections of the submission document which will become redundant once the document has been adopted. Could the Council provide a schedule that details the areas of text that will need to be either deleted or amended in the adopted version.

These answers are to assist in the production of a binding report. Once you have submitted your response to these questions, the report will be produced as quickly as possible. Please reply to Steve Carnaby whose details are given above. Thank you for your assistance in this matter.

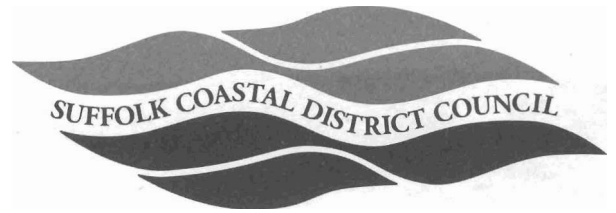
Yours sincerely,

A handwritten signature in black ink, appearing to read 'KHolland', written in a cursive style.

Keith Holland BA(Hons) Dip TP MRTPI ARICS

# Suffolk Coastal District Council

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Our Ref: MD/SCI/10.5.4  
Your Ref: PINS/J3530/429/2

16 May 2006

Dear Mr Carnaby,

## **SUFFOLK COASTAL DISTRICT COUNCIL – STATEMENT OF COMMUNITY INVOLVEMENT**

Thank you for your letter dated the 8<sup>th</sup> May 2006 regarding the above document. Please find enclosed a copy of your letter together with the Council's responses for your consideration.

A copy of the Council's responses has also been sent to Go-East for their information.

I look forward to hearing from you with regard to the binding report. In the meantime, please do not hesitate to contact me on any further information you may need.

Yours Sincerely,



Matt Deakin  
Planning Officer

## SCDC suggested SCI changes for PINS - May 2006

### Test iv)

Please see amended tables below:

#### Development Plan Documents

<b>STAGE OF DPD PREPARATION (When)</b>	<b>WHO WILL BE INVOLVED (Who)</b>	<b>LIKELY METHOD OF INVOLVEMENT (How – see para. 8.03))</b>
Pre-production – Evidence gathering; e.g. housing needs survey, urban capacity study, etc.  See the Local Development Scheme for timetable of work.	Specialist agencies; development interests; land interests; Local groups/bodies who may hold information Neighbouring local authorities	<b>Dialogue &amp; Group Participation:</b> Letters/telephone calls Email Project meetings
Continuing community involvement on Issues and Options together with sustainability appraisal  Regulation 25	Suffolk Coastal LSP Town/Parish Councils Other relevant groups/organisations	<b>Publicity, Dialogue &amp; Group Participation:</b> Website Email Letter Workshops Discussion meetings
Preparation of, and 8 week consultation period on, Issues and Preferred Options together with sustainability appraisal.  Regulation 26  See the Local Development Scheme for timetable of work.	Suffolk Coastal LSP Town/Parish Councils Other relevant groups/organisations Known landowners	<b>Publicity, Dialogue &amp; Group Participation:</b> Website Email Letter Workshops Discussion meetings
6 week formal public consultation period on draft document, at submission stage together with sustainability appraisal.  See the Local Development Scheme for timetable of work.	LSP Town/Parish Councils Statutory consultee bodies Other relevant groups/organisations Known landowners General public All on LDF Contacts database	<b>Publicity, Dialogue &amp; Group Participation:</b> Website Email Letter Individual meetings Libraries
6 week formal public consultation period if alternative allocated sites are proposed together with sustainability appraisal details at the submission stage.  Regulation 32/33	Local Public Known Landowners Local Parish/Town Councils Statutory consultee bodies Relevant/local groups/organisations.	<b>Publicity, Dialogue &amp; Group Participation:</b> Website Email Letter Individual meetings Libraries Site Notices
Adoption  See the Local Development Scheme for timetable of work.  Regulation 36	All previously involved in the process	<b>Publicity:</b> Press release Newspaper (regulatory) Notices Website notification

## Supplementary Planning Documents

<b>STAGE OF SPD PREPARATION (When)</b>	<b>WHO WILL BE INVOLVED (Who)</b>	<b>LIKELY METHOD OF INVOLVEMENT (How – see para. 8.03)</b>
Pre-production – Evidence gathering; e.g. scoping of site/development constraints  See the Local Development Scheme for timetable of work	Specialist agencies/utilities providers; development interests; land interests; Local groups/bodies who may hold information (dependent on type of document, whether site specific or district-wide)	<b>Dialogue &amp; Group Participation:</b> Letters/telephone calls Email Project meetings
Preparation of and 6 week consultation on draft document together with sustainability appraisal.  Regulation 17  See the Local Development Scheme for timetable of work	Suffolk Coastal LSP Town/Parish Councils Other relevant groups/ organisations General Public	<b>Publicity, Dialogue &amp; Group Participation:</b> Website Email Letter Discussion meetings Libraries
Adoption Regulation 19  See the Local Development Scheme for timetable of work	All previously involved in the process	<b>Publicity:</b> Press release Newspaper Notices Website notification

### Test v)

The Council proposes to insert a new paragraph after the existing paragraph 7.03:

**The Council is committed to diversity and social inclusion to ensure that everyone has access to services and is treated fairly. There are key pieces of Government legislation to which the Council will comply. These include:**

- **Race Relations Act 2000, particularly the need to eliminate unlawful racial discrimination and promote equal opportunities. The main issue within this district will relate to the fact that English may not be the first language**
- **Disability Discrimination Act 1995 and the need to promote an equal quality of service. Issues here will revolve around physical access to consultations venues and visual impairment**

**The means by which the Council will seek to meet the requirements of the above legislation are set out in the schedule following paragraph 7.07. In respect of the availability of documents in appropriate formats the Council will have regard to what is practical**

**and cost effective. The profile of the district (see section 6) shows that ethnic minorities account for an extremely small proportion of the district and the first language of over 98% of the district is English. Therefore, all documents will be published in English and requests for other languages will be considered upon request. With regard to visual impairment, large print editions will be prepared upon request.**

The Council would propose to add the following paragraph to the space below the title on page 1 of the SCI. As its profile shows, the district has a very small ethnic minority population and demand for documents in alternative formats is very limited; the main request being for large print. It is therefore more appropriate for the Council to be reactive to such requests as production is not cost effective.

**Requests for this document to be made available in another language, large print, Braille or on audio tape can be submitted to the Council on 01394 383789 or email [development.policy@suffolkcoastal.gov.uk](mailto:development.policy@suffolkcoastal.gov.uk) and the Council will do its utmost to help.**

Regarding the availability of all other LDF documents, the Council proposes to insert the following text into Section 5 of the SCI:

#### **Availability of documents:**

**All documents produced as part of the Local Development Framework including consultation drafts, will be available from their time of production at the Council's Offices in Woodbridge as well as through the Council's website. Requests for documents to be made available in another language, large print, Braille or on audio tape can be submitted to the Council and it will do its utmost to help.**

#### **Test vi)**

The Council proposes to add the following paragraph regarding resources:

**The Council is fully committed towards community involvement in planning and already exceeds statutory consultation requirements. The Council has considered the financial requirements for community consultation as set out in this document and has made provision for enough financial and other resources to cover the programme of the Local Development Framework. However, forced changes to the Council's budget could affect the resourcing of the programme and these may need to be taken into account in future reviews of the SCI.**

In the meantime, the Council will seek to use resources effectively by:

- Monitoring and reviewing the methods of consultation
- Undertaking joint consultation wherever practical
- Using consultants where these add value and provide additional skills
- Continually developing electronic consultation where this is efficient and reduces costs
- Exploring innovative and cost effective methods of consultation

At all times, the Council will use the most suitable and efficient consultation method and means, targeted at the appropriate sectors of the community.

### Editorial changes

The Council recommends the following editorial changes:

Page:	Original text:	Suggested action:
ALL	Document footer: "Submission Draft Statement of Community Involvement"	<b>Replace</b> with "Statement of Community Involvement"
Front Cover	Title text: "Statement of Community Involvement February 2006"	Adopted document to include correct month of formal adoption.
1	Title text: "Submission Draft February 2006"  Invitation to respond to consultation.	<b>Replace</b> with "Adopted ____ 2006". Adopted document to include correct month of formal adoption.  <b>Delete</b> text.  <b>Insert</b> text regarding alternative document formats as per Test v) paragraph above.
3/4	Title: "The Draft Statement of Community Involvement"  Stage 3 February 2006 – Formal submission ....	<b>Delete</b>  <b>Amend</b> to reflect past tense and remove references to inviting consultation at this stage.
4	Para 4.02 "(programmed for November 2005 – March 2006)"	<b>Amend</b> to "(which occurred between November 2005 – March 2006)"
11	Consultation So Far information box	<b>Amend</b> penultimate paragraph relating to sustainability appraisal consultation to read as follows: "Continuing consultation will also occur relating to the appraisal of the LDF in terms of sustainability and environmental impact".

12	Para 9.02 “The feedback gained from the workshops has been built into both the draft SCI and this final version and more generally will be considered in the Local Development Framework process”.	<b>Amend</b> to read as follows: “The feedback gained from the workshops has been built into the production of this document and more generally will be considered in the Local Development Framework process”.
17	Section 15  Invitation to comment on document in information box.	<b>Delete</b> Section 15 entirely.  <b>Delete</b> information box entirely
18	Information relating to application of the tests of soundness	<b>Amend</b> opening paragraph to the following: “The Statement of Community Involvement (SCI) has been subject to an examination by an Inspector. At the examination, the Inspector used the following criteria, as set out in Government guidelines, in order to test the soundness of the SCI:-“
Comment Form	Form for consultation responses.	<b>Delete</b> form.