

Report of the Strategic Director (Services)

STATEMENT OF COMMUNITY INVOLVEMENT

Synopsis:

This report sets out the response to consultation on the draft Statement of Community Involvement (October 2004), and recommends consequent changes to the document ahead of republishing for further community engagement.

Commentary:

1. At the Local Development Framework Working Group on 30 September 2004, Members approved, subject to amendments, the draft Statement of Community Involvement (SCI) as the first stage of community engagement in the preparation of the Forest Heath Local Development Framework (LDF); (Report No. LDF04/016 and Minute 072 refer). The draft SCI was subsequently presented to the Extraordinary Council meeting on 26 October 2004, to enable all Members to consider and agree the draft SCI prior to publication; (Report No. COU04/167 and Minute 848 refer).
2. Publication of the draft SCI was heralded by a Launch Event held at the District Offices on 10 December 2004. The Launch Event was aimed at Town/Parish Councils and the Brandon, Mildenhall and Newmarket Community Partnerships. The LDF Working Group on 13 January 2005, considered a report on the outcome of the Launch Event; (Report No. LDF05/020 and Minute 091 refer). Appendix 1 to that report provides a summary of the comments made by participants at the Launch Event. Appendix 1 is reproduced as Working Paper 1 to this report.
3. From a database compiled over the last 4 years or so, in the region of 430 copies of the draft SCI were dispatched to consultees ranging from statutory bodies, public and private organisations to individual members of the public. The consultation period ran for 7 weeks from 10 December 2004 to 28 January 2005. Respondents were encouraged to submit their comments on the Feedback Form attached as Appendix 7 to the draft SCI.
4. A total of 88 responses to the draft SCI have been received. These comprise of 70 completed/part completed Feedback Forms and 18 specific letters. Overall, these

represent a response rate of 20%, which is considered to be good for this type of consultation exercise. A list of those responses received is set out in Working Paper 2 attached to this report. In addition to the formal responses received by way of Feedback Forms and specific letters, other expressions of interest in the LDF have been made. These have been as a result of articles appearing in “The Forest Heath News”, “Mildenhall Messenger” and “2020 Vision” leaflet, and via the Council’s website/E-mail facility. In total, these generated 37 expressions of interest, which have been added to the LDF database.

5. As mentioned above, Working Paper 1 summarises the comments made by participants at the SCI Launch Event. Some of the comments relate to roles that Town/Parish Councils and Community Partnerships could play in engaging the community in the LDF process; these are shown by **(1)**. The revised SCI document therefore commends these to Town/Parish Councils and Community Partnerships for their consideration and implementation (see page 7 of revised SCI). Those comments that are shown by **(2)** will be incorporated in the revised SCI. But those shown by **(3)** are not considered appropriate on the basis of being unmanageable in terms of the resources available to the overall process of LDF preparation. The “Additional comments” as set out in Working Paper 1 relate mainly to operational/organisational matters and can be incorporated when for example, arranging specific community engagement events. The “Additional Consultees” as set out in Working Paper 1 can all be added to the LDF database. It is **not** proposed to add them to Appendix 5 of the draft SCI since it is proposed to follow the advice of GO-East and revise this appendix to limit it to the types of consultees rather than specific names. This is because names could change quite quickly, requiring consequent amendments to the SCI.
6. Questions 1 to 5 inclusive of the Feedback Form, are the most pertinent in terms of indicating the need for changes to the SCI and the nature of any such changes. An analysis and summary of the answers received to those questions is set out in the attached Working Paper 3. The following coding is used alongside each comment raised: -
 - (1)** = already included on the LDF database / will be added to the database / or examples of the category are represented by entries on the database;
 - (2)** = agree and already adequately represented in the SCI;
 - (3)** = change made to the SCI;
 - (4)** = agree but requires no response in relation to the SCI;
 - (5)** = disagree – considered unmanageable in terms of the resources available to the overall process of LDF preparation.
7. In addition to the proposed amendments suggested by consultees, the publishing of the Local Development Scheme (LDS) and emerging officer/member discussion on promoting and consulting on the Core Strategy Issues and Alternative Options, have both prompted the need for further amendments.
8. As a consequence, an amended document (Working Paper 4 to this report) presents a Preferred Option SCI document, which will be the subject of public participation. All proposed amendments/additions are shown in underlined and italic text.

Finance/Budget/Resource Implications

9. £41,120 allocated for Local Plan/LDF preparation 2004-05. Further responses for professional fees and community consultation may be required as the process evolves in subsequent years.

Policy Compliance/Power

10. There is a statutory duty to prepare a Local Plan/LDF. Corporate and Community Plans. Best Value Performance Plan.

Performance Management Implications

11. Best Value Indicator 200.

Legal Implications

12. Planning and Compulsory Purchase Act 2004.

Human Rights Act and Diversity Implications

13. The Government has confirmed that the Planning and Compulsory Purchase Act 2004 is compatible with The Human Rights Act 1998.

Crosscutting Implications

14. Corporate and Community Plans.

Risk Assessment

15. Without proper community engagement in the LDF process, a LDF will not proceed to adoption. The preparation of an up to date planning policy framework is a statutory requirement and the subject of a Best Value Performance Indicator. The lack of such a framework militates against the proper planning of the District and could place the Council at risk of Planning Appeals being upheld with the possible award of costs against it.

Council Priorities

16. The preparation of a LDF for Forest Heath to provide up to date planning policies is an integral part of the delivery of the four Council priorities.

Recommendation:

- 17. It is recommended that Members approve the Preferred Option SCI document for the purpose of public participation.**

Documents Attached

1. Working Paper 1 – Summary of comments made by participants at the SCI Launch Event held on 10 December 2004.
2. Working Paper 2 – List of respondents to the draft SCI.
3. Working Paper 3 – Analysis and summary of the answers received to Questions 1 to 5 inclusive of the draft SCI.
4. Working Paper 4 – Preferred Option SCI document.

Tony Pierce
Strategic Director (Services)
May 2004.

BACKGROUND PAPERS

1. Documents attached
2. Draft Statement of Community Involvement (October 2004).

CONTACT OFFICERS

John Smerdon and Andy Durbar.

Local Development Framework
Statement of Community Involvement Launch (10/12/04)
Workshop summary

CONSULTATION METHODS - Suggestions

- Media – in particular, radio / TV. (2)
- Parish council meetings (2)
- Parish council newsletters (1)
- Village plans (1)
- Face-to-face meetings (2)
- Door to door 'canvassing' (1)
- 'Helpline' (2)
- Village party! (1)
- Parish website (1)
- Telephone questionnaire (3)
- Street interviews (3)
- Static displays (inc., laminated posters) (2)
- Text messaging (3)
- Presentations (2)
- Village events (1)

Additional comments –

- Venue should be local
- Transport may need to be provided
- Time scales should be made clear
- Consultation needs to be in 'plain English'
- May need resources / funding
- Locations of events need to be accessible
- Consultation should include 'non written' methods
- Information needs to be 'interesting'

ROLES

- Parish councils could arrange 'door to door' calling on hard to reach groups
- Parish council should have representation on the LDF 'groups' or process
- Parish councils need a 'point of contact' in FHDC
- Parish council could distribute letters about the LDF

ADDITIONAL CONSULTEES

- S.A.L.C
- Mildenhall Business Association
- Animal Health Trust
- Playgroups
- Mildenhall in Bloom
- National Trust
- Local estate agents
- Citizen Advice Bureau
- SAVO
- Volunteer network
- Churches / church councils
- Suffolk Historic Buildings Group
- Travellers groups
- Emergency services
- District nurses
- Tourist information centres
- Housing associations
- Schools
- Colleges
- Cycle club / sporting clubs / playing fields / sports centres
- Organisations in receipt of FHDC funding.

- Local businesses / industrial units
- Gay / lesbian groups
- Community partnerships
- Supermarkets
- Youth groups
- Hard to reach groups

KEY TO ABOVE CODING: -

(1) = commended to Town/Parish Councils and Community Partnerships.

(2) = to be incorporated in the revised SCI.

(3) = not considered appropriate for inclusion in revised SCI.

RESPONSES TO THE DRAFT SCI via FEEDBACK FORMS AND/OR SPECIFIC LETTERS.

<u>Individuals/Consultants.</u>	<u>Authorities/Organisations.</u>
R. D. Woby @ HOOPERS ARCHITECTS	Chris Price @ NETWORK RAIL
PETER WALDER	Mike Dowdell @ EAST OF ENGLAND TOURIST BOARD
NEIL DORRINGTON	Nick Sibbett @ ENGLISH NATURE
	Raymond Cole @ NATIONAL PLAYING FIELDS ASSOCIATION
MAUREEN KOWALYK	David Dufty @ TRANSPORT 2000 (Ipswich & Suffolk Group)
ANDY DRUMMOND	Richard English @ SUFFOLK CONSTABULARY (Police Architectural Liaison Officer)
Chris Loon @ BELLWAY HOMES	Sue McAllister @ NEWMARKET COMMUNITY PARTNERSHIP
MICHAEL LEPPER (Chartered Surveyor)	Wil Gibson @ SUFFOLK ACRE
Barry Goodson @ LIDL UK GmbH	EQUAL OPPORTUNITIES COMMISSION
ROY QUARRELL	John Long @ GO-East
MR. P. RAYMOND	Wing Co. Allan Bone @ HQ3AF RAF MILDENHALL
HEATHER WALLACE	Graham King @ THE COUNTRYSIDE AGENCY
ATIS REAL WEATHERALLS (on behalf of Royal Mail Group)	N. J. Manderfield – Chairman, CROXTON PARISH COUNCIL
Rob Hopwood & Peter Symonds @ BIDWELLS PROPERTY CONSULTANTS	BURWELL PARISH COUNCIL
DENNIS CRONE	Jim Gilbert on behalf of EXNING PARISH COUNCIL and NEWMARKET COMMUNITY CHURCH
Keith Reid @ ANIMAL HEALTH TRUST	Roger Cutting @ CAMBRIDGE UNIVERSITY HOSPITALS NHS FOUNDATION TRUST
JOHN BARKER (Editor, “Mildenhall Messenger” and Chairman, Mildenhall Town Centre Forum)	Roy Warren & Philip Raiswell @ SPORT ENGLAND EAST
Peter Webster @ WEBSTER ASSOCIATES	Colin Bambury @ THE HIGHWAYS AGENCY
Stephen Walsh @ UNEX GROUP	Mrs. J. Broadway – Clerk, CHIPPENHAM PARISH COUNCIL
John Barton @ HPN Ltd (Architects).	John Theobald – Clerk, WOODDITTON PARISH COUNCIL
N. W. PEACHEY	<u>NEWMARKET TOWN COUNCIL</u>
Nick Woolley @ WOOLLEY & COMPANY	SUFFOLK WEST FEDERATION OF WOMEN’S INSTITUTES
Katie Lazzam @ MALCOLM JUDD & PARTNERS (on behalf of National Grid Transco)	Lorraine Stone – Clerk, MOULTON PARISH COUNCIL
Rob Hopwood @ BIDWELLS PROPERTY CONSULTANTS (on behalf of Parker Brothers (Mildenhall) Ltd)	Michael Gurney for LAKENHEATH PARISH COUNCIL
MRS. S. J. HOUGH	Andrew Holman – Clerk, HERRINGSWELL PARISH COUNCIL
LLOYD HUGHES	Ed Chambers – Clerk, THETFORD TOWN

		COUNCIL
Keith Johns @ THE JOHNS PRACTICE		Tony Chadwick @ THE WOODLAND TRUST
NEAL ENTWISTLE		Katharine Fletcher @ ENGLISH HERITAGE (East of England Region)
Bob Sellwood @ SELLWOOD PLANNING (on behalf of The Earl of Derby)		Mrs. P. Watson – Clerk, ICKLINGHAM PARISH COUNCIL
JOHN HOWELL		Mary Crane – Clerk, ERISWELL PARISH COUNCIL
Tim Rainbird @ RPS (on behalf of BT plc)		Harry Spencer – Clerk, WORLINGTON PARISH COUNCIL
MR. D. ARNOLD		John Taylor on behalf of MILDENHALL PARISH COUNCIL
Anna Cheney @ HEPHER DIXON		Mrs. E. Poulter – Clerk/Secretary, TUDDENHAM PARISH COUNCIL
Tim Rainbird @ RPS (on behalf of Fairview New Homes)		Philip Prigg – Chairman, KENTFORD PARISH COUNCIL
Cassie Holland @ PEACOCK & SMITH (on behalf of Wm Morrison Supermarkets plc)		James Bercovici – Clerk, BARTON MILLS PARISH COUNCIL
MRS. M. I. MORLEY		
MR. A. J. FOWLER		
Darren Cogman @ CARPENTER PLANNING CONSULTANTS (on behalf of Persimmon Homes (Anglia) Ltd)		
MIKE MALINA		
Norman Gillan @ MONO CONSULTANTS Ltd (on behalf of Mobile Operators Association)		
MR. V. H. FRANCIS		
Roger Sargent @ RPS		
BRIAN HILL		
Chris Storey @ SB SURVEYORS		
Keith Wharmby @ LA FARGE AGGREGATES Ltd		
RICHARD TILBROOK		
LINDA V. DAVEY (Suffolk West Primary Care Trust)		
MRS. JANICE CAVELL		
HUGO UPTON		
MARGARET BUSH		
GORDON SMITH		
KAREN VICKERY		
DON MACBEAN		
STUART HASTINGS		
Philip Cobbold @ PEECOCK SHORT		
GORDON TERRY.		

WORKING PAPER 3 – Analysis and summary of the answers received to Questions 1 to 5 inclusive of the draft SCI.

Question 1 – Are we involving the right people in the production of the new development plans?
Yes - 54
No - 11
Don't know - 5
Question 2 – Who else should be involved?
<ul style="list-style-type: none"> • In some ways too many for a sound strategy to evolve. (4) • More local resident opinion where changes directly affect their immediate environment. (2) • Simon Norton – Transport 2000 (Cambs & West Suffolk Group). (1) • Headquarters of Commercial Occupiers where long lease or freehold is owned. (1) • Everyone! (4) • Developers (as opposed to only architects, planners etc). (1) • Mildenhall Museum. (1) • Newmarket Town Council. (1) • Chairman of Local Clubs e.g., Probus Club, 50+ Forum, to achieve wider dissemination of information. (1) • Commercial Developers and Major Employers. (1) • Other Industrial Sectors – Waste, Minerals Extraction. (1) • The consultees added by the workshop on 10 December 2004. (1) • Prospective Developers. (1) • Suffolk Playing Fields Association. (1) • In relation to Appendix 5: - <ul style="list-style-type: none"> - Is there a Mildenhall Chamber of Commerce? - For “Country Landowners Association” read “Country Land and Business Association”, and add - Chartered Surveyors (with Planning Consultants) - Greenpeace - N. A. G. (1) • Landowners/Developers at the ‘First Stage’. (1) • More public meetings re: large projects e.g., healthy living centre. (2) • Commission for Architecture and the Built Environment; Ancient Monuments Society; Council for British Archaeology; Society for the Protection of Ancient Buildings; The Georgian Group; The Victorian Society; The Twentieth Century Society; Garden History Society; The National Trust; Local Civic/Amenity Society; Local Building Preservation Trusts; Local Archaeological and Antiquarian Societies; and Local History Societies. (1) • Icknield Way Association and British Horse Society. (1)
Question 3 – Are we using the right ways to consult?
Yes - 61
No - 5
Don't know - 4

Question 4 – What other ways do you consider we should use to consult?
• Information from the workshops. (2)
• Ensure effective facilitation of working groups to get a wider view. (2)
• Phone. (5)
• I have a front page and page 3 story in “Mildenhall Messenger 7”, with cut-out slip. (4)
• Meet the public face to face on street corners and market areas etc. (2)
• By direct contact with development site owners. (2)
• Use Development Control to identify sites. (2)
• An auditable method of measured issue prioritisation to ensure and prove that the needs and wishes of the “silent majority” are not overcome by any “vociferous minority”. (3)
• More emphasis should be given to the potential of Email. (3)
• Reply to points raised in correspondence. I consider my letter of 31 March 2000 was clear and constructive. Were any of the points considered? (5)
• Use press officers to ensure more gets published. Need for greater communication between the District Council, the Town Council and the Community Partnership. (3)
• Please note I have found no enthusiasm amongst parish council members for door knocking, telephone/text messaging. (4)
Question 5 – Please make any further comments on this draft SCI.
• Trawl the flip-chart sheets! (2)
• Housing should be in the list of topics in Question 8. (3)
• Approximate dates for the stages would be of assistance. (3)
• Although I have received the draft statement, I do not appear on your formal list of consultees and focus groups. (1)
• The inclusion list appears very comprehensive. (4)
• In Appendix 5, section 12 – “RAF” should read “RAF SRAFLO HQ 3AF”. (1)
• Croxton Parish Council appreciates being invited to comment. However feels that it is unnecessary for us to be part of consultation in this case. (4)
• If we can get a hundred responses from the “MM7”, I shall be delighted! More would be better!!! (4)
• Please note [Burwell Parish] Council have agreed that they do not wish to be part of this consultation process. (4)
• A wider review on how the horse racing policy is stifling Newmarket is required. Also a more up to date housing needs study and a more realistic assessment of employment land requirements. (4)
• We are pleased you decided to contact adjacent parishes in Cambridgeshire, as we are affected by F.H. plans. (1)
• Ensure Parish Councils in ECDC are informed and able to participate in consultations. (1)
• I feel in the past – as an ordinary resident – that I have been kept in the dark as to the workings of any type of development. (3)
• Well laid out/presented clearly. If this draft SCI is followed as stated then LDF should work well. (4)
• Plans should reflect local wishes rather than being fitted in to form that matches the overall scheme. E.g. much more weight should be given to Parish Council

input regarding what they want for their area. If their desires are beyond acceptable, then more feedback is needed to say why. (3)
<ul style="list-style-type: none"> • Make sure young people are involved – it's their future. Get away from use of such formal language. (2), (3)
<ul style="list-style-type: none"> • Consultation will only be effective if you have a dialogue with Parish Councils on all local issues and take note of grass root knowledge and information. (2), (3)
<ul style="list-style-type: none"> • When is this stuff going to be delivered as per Page 4 – Consultation Methods. (3)
<ul style="list-style-type: none"> • Good process and documentation! On your web page the weekly planning applications are nearly three weeks old. You need to post these faster as the 21 days are nearly up before they can be read! Otherwise good job. (4)
<ul style="list-style-type: none"> • My personal requirements are covered adequately under “Consultation on Supplementary Planning Documents” bullet point 6. (4)
<ul style="list-style-type: none"> • Increased publicity to make more people aware of the process should be undertaken, to allow those not involved in the development industry to have an involvement in the preparation of policies which will directly affect them. (2), (3)
<ul style="list-style-type: none"> • I consider that significant specific site proposals should be sought at an earlier stage to ensure that they are taken into account before the draft plan is prepared. I appreciate that consultation with interested parties may achieve this but an early request for proposals would be desirable. (2)
<ul style="list-style-type: none"> • Time from receipt of documents to date of reply is not long enough for parishes who don't meet every month. (2)
<ul style="list-style-type: none"> • Suggestions made at workshop on 10 December 2004. (2), (3)
<ul style="list-style-type: none"> • Worlington Parish Council shall bring stage-progress reports to attention of parish residents by publishing information about the matter in its local magazine and upon village hall notice board. (4)
<ul style="list-style-type: none"> • Less jargon please. (2)
<ul style="list-style-type: none"> • The LDF Document is crying out for a contents page. (3)
<ul style="list-style-type: none"> • The process seems very complicated with too many “Buzz words”. (2)
<ul style="list-style-type: none"> • The NPFA's paper “Development Plans and Statements of Community Involvement” should be taken into consideration. (4)
<ul style="list-style-type: none"> • GO-East draw attention to the following questions which relate to the tests of soundness for SCIs: - <ol style="list-style-type: none"> a) Does the SCI meet minimum regulatory requirements? b) Who will be consulted? c) Is a joined-up approach proposed? d) Are the methods accessible and appropriate? e) Is the SCI realistic and effective? <p>The list of groups in Appendix 5 should refer to the types rather than names to avoid amending the SCI due to changes of names. (3)</p>
<ul style="list-style-type: none"> • The Countryside Agency raise the following in relation to SPDs: - <ul style="list-style-type: none"> - The Public Open Space Provision SPD should include access to and facilities in the countryside; - Development/Design Briefs should encourage the preparation of ‘concept statements’; - The list of SPDs to include generic reference to “Town and Village Design Statements as may be promoted by Local Communities”. (4)
<ul style="list-style-type: none"> • Sport England draw attention to the following planning tools and recommended research: - <ul style="list-style-type: none"> - Planning Contributions Kitbag; - Playing Pitch Strategy;

<p>- Facilities Planning Model. (4)</p>
<ul style="list-style-type: none"> • The Highways Agency should be included in Appendix 1 – “List of Statutory Consultees (‘Specific Consultation Bodies’)”; and The Agency would welcome the opportunity to discuss issues emerging from the preparation of the LDF that may relate directly to, or could have an impact on the trunk road network. (3)
<ul style="list-style-type: none"> • Q4 answer especially relates to facilitated workshops in Stage 2. Responses MUST be those of the stakeholders with their direct prioritisation and <u>not</u> the interpretation of facilitators. (4)
<ul style="list-style-type: none"> • On behalf of National Grid Transco our comments are normally in the form of objections to policies as they appear in consultation documents at the various stages of plan preparation. However, we would much prefer to be involved at the outset of establishing a policy by providing informal comments in confidence during your policy development. (4)
<ul style="list-style-type: none"> • The SCI should make it clear that if sites are made known to the Council at Stages 1 and 2, it is the Council who will undertake the strategic environmental assessment of that site and consult on it. The responsibility to do this only shifts to the developer where the site is not disclosed until Stage 3. (4)
<ul style="list-style-type: none"> • BT wishes for the emerging new development plan system to support and protect its operations whilst enabling appropriate development, but also to avoid situations where sites may become sterilised by plan policy or allocations. Therefore, BT asks that it becomes a consultee on the LDF as a matter of course and that it be consulted in response to planning applications on sites close to its property. (2)
<ul style="list-style-type: none"> • The document makes a central distinction between community and stakeholders. We find this unhelpful. To split these camps into two sides opposing each other cannot be in the interests of working together. You refer on page 8 to customers, stakeholders and partners. It would be helpful to have these terms defined. Page 9 lists a number of priorities. We presume these are statements that it is assumed people agree with. We are not so sure, such terms as ‘cultural provision’ need careful explanation to not mean everything or nothing. There also needs to be a recognition of reality in the final statement about establishing the area as the cultural heart of the region. Clearly this is arrant nonsense. To promote such generalised statements could enable some stakeholders or others to be particularly misled as to what they might truly mean. These need clarity and agreement before this use. The involvement of a local community in local development plans is to be much applauded. Great efforts must be taken to make sure a meaningful dialogue is developed and maintained. (3), (4)
<ul style="list-style-type: none"> • It is important that local people have access to the LDS (Local Development Scheme) and supporting information. Further guidance on how FHDC would expect its residents, local groups and businesses to be consulted on major projects may be beneficial. This would give local people a guide to the extent to which they could expect to be consulted and would also assist developers to set up their relevant consultation mechanisms and opportunities. (3)
<ul style="list-style-type: none"> • In submitting a model Telecommunications Development policy and introductory text, the Mobile Operators Association considers it important that there remains in place a telecommunications policy. This should be criteria based to guide telecommunications development and that whilst regard should be had to siting and design considerations, operational efficiency should not be inhibited. (4)
<ul style="list-style-type: none"> • As an owner of land in Forest Heath I look forward to being invited to join workshop/focus groups to discuss the LDF. (4)

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|--|
| <ul style="list-style-type: none"> English Heritage indicate that the status of Conservation Area Appraisals should be given further consideration as potential SPD; The Landscape Character Assessment SPD should incorporate historic landscape character assessment; and attention is drawn to the following documents: - “Environmental Quality in Spatial Planning: Incorporating the natural, built and historic environment, and rural issues in plans and strategies”, and “Planning and Development in the Historic Environment – a Charter for English Heritage Advisory Services”. (3), (4) |
| <ul style="list-style-type: none"> I understood the community was already supposed to be involved in planning. Maybe it’s “communication” that’s the problem. And taking note of objections. It’s a case of listen and look. (4) |
| <ul style="list-style-type: none"> Unfortunately the ‘unveiling’ of the Watermark project in our locality at tolerably the same time as the LDF workshop has not inspired confidence in the LDF procedure. (4) |

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