

Statement of Community Involvement in Planning

Public Involvement Statement May 2015

Summary of responses

and

*How the consultation responses have shaped the Statement of
Community Involvement in Planning*

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Statement of Community Involvement in Planning: Public Involvement Statement May 2015

Introduction

The Statement of Community Involvement in Planning (SCIP) sets out how the City Council will involve the local community and stakeholders in preparing planning policy documents and determining planning applications.

In revising the SCIP, it was important to involve the community and other stakeholders, in order to develop an approach that reflects the needs and aspirations of the community, stakeholders, as well as regulatory requirements.

This Public Involvement Statement explains:

- i. The consultation and engagement that was undertaken to inform the revised SCIP;
- ii. Who responded to the formal consultation; and
- iii. How the comments have been taken into account in preparing the SCIP.

Consultation and engagement to inform the review of the SCIP

There were several ways that the City Council used people's comments, about our consultation processes, to inform the review of the SCIP. We published a draft version of the SCIP for formal consultation, and we also reviewed people's comments and complaints from the last year where they related to engagement in the planning process.

Engagement to inform the initial drafting of the SCIP (*informal early engagement*)

Prior to commencing the review of the SCIP we reviewed various sources of feedback about our current approach to consultation, such as what works well, what could be improved, as well as asking people how they prefer to contact or be contacted by the City Council.

In order to do this we:

- Sent out questionnaires with the Pre-submission consultation for the Northern Gateway AAP (July 2014) asking how individuals and groups how they want to find out about, and be involved in, planning in Oxford;
- Reviewed comments, compliments and complaints received by City Development;
- Reviewed feedback forms from previous consultation events;
- Spoke to colleagues across the planning department, as well as the corporate consultation officer.
- Reviewed responses to the City Development Customer Awareness Survey (2013) and the Planning Policy Customer First Project (2013).

The information gained helped to identify the main areas of change in the document, and to inform the first draft of the revised SCIP.

Consultation on the draft SCIP (*formal consultation*)

We then published for consultation the draft SCIP to get further feedback from the community and stakeholders about our proposed approach, and to if they had any other ideas for improving planning consultations.

The consultation ran for six weeks from 6th January to 17th February 2015. People could submit comments via an online questionnaire, printed copies of a questionnaire, or by email or letter. Hard copies of the consultation documents were available to view on the website, at the City Council's main offices (St Aldate's Chambers), and at public libraries across the City during opening hours.

We also contacted the following people that the consultation was taking place and let them know how they could get involved:

- All those registered on the City Council's consultation database as having an interest in planning in Oxford (approximately 2,000 people);
- All the organisations and individuals listed on the City Council's planning policy consultation database (approximately 300 people, including national and local interest groups, residents' associations, local and national government organisations, parish councils, planning agents and developers);
- Participants of the Development Management User Group (representatives of approximately 25 organisations who regularly use Oxford's planning services, such as planning agents); and
- Oxford City Council councillors.

Who responded to the formal consultation?

A total of 23 responses were received at the formal consultation stage. This relatively low response rate was not un-expected due to the procedural nature of the subject matter. People tend to be more interested when there is a specific location or development proposal to discuss.

However despite the low response rate, the comments received were from a range of service users (Figure 1) and provided a large amount of detailed information and suggestions for service improvements.

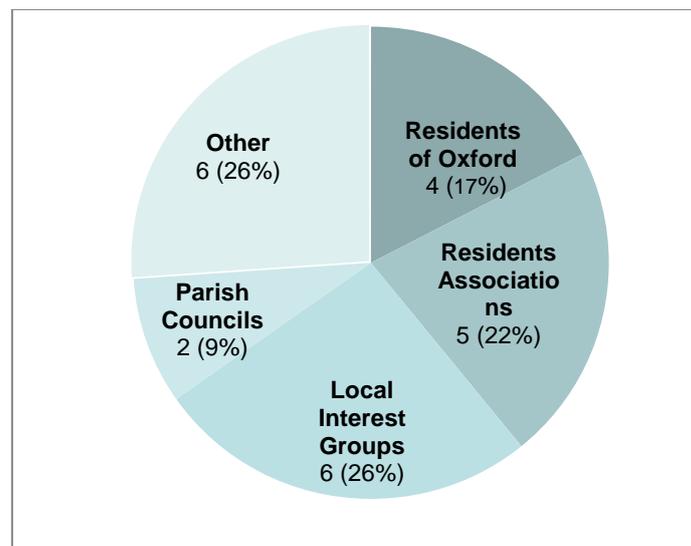


Figure 1: Responses to the SCIP formal consultation (January-February 2015)

The 'other' responses received included: The University of Oxford; Wolvercote Neighbourhood Forum; an architect; The Mobile Operators Association; Natural England; and the Highways Agency.

The local interest groups that responded included: Oxford Preservation Trust; Oxford Civic Society; and Headington Action.

How the comments have been taken into account in preparing the SCIP

The table below summarises the comments received at the formal stage of consultation and explains how we have taken them into consideration.

The comments were generally quite detailed and specific, based on the users experiences of planning in Oxford, so there were not necessarily common themes across them, however some of the main themes from the comments were:

- Early engagement is widely supported;
- Over-reliance on online consultation methods. We need to ensure that we do not exclude those without internet access;
- IT issues are regularly encountered with the current consultation systems
- Officer reports should be clearer in how comments have been considered (feelings that comments were ignored or not heard);
- Be upfront about how consultation responses will be used and be clear that consultation is not a vote;
- Work more closely with community and representative groups, in making people aware of consultations and getting people involved;

In some cases we have made changes directly to the SCIP wording, for example:

- We have made our commitment to early community engagement even stronger in both the planning policy and planning application processes. This includes providing additional advice for developers on how they can engage with communities at the pre-application stage;
- There is a commitment in the SCIP's core principles to provide feedback on consultations and to be clear about how we have considered comments. We will be exploring new ways of communicating this to community through the SCIP Action Plan;
- We have provided more information on who Oxford's communities are;
- We have emphasised even more strongly our commitment to ensuring that those without access to the internet will not be excluded from our consultations.

In other cases there may be wider issues that we cannot address immediately in the SCIP but nonetheless they are constructive points that will help us to continuously improve public engagement in planning decisions. Those points have been noted and an 'Action Plan' has been drawn up to set out clearly how we intend to respond to them appropriately through other means. This includes some of the on-going IT issues, and also where we need to do further work to explore communication tools such as social media.

There were also some issues raised that did not result in changes to the SCIP (for example when the issue raised had already been covered by the SCIP, or when the suggestion was beyond the scope of what we could reasonably deliver). Where this is the case, we have explained why.

In considering people's comments, it is important to note that public comments are not the only factor that needs to be taken into account in planning decisions. We have to balance a number of factors, including government policy and legislation, best practice, and political

priorities or decisions about what is in the best interest of those living or working in the city, including people who may have been silent during a consultation.

We do however recognise that it can be frustrating for people, if you have taken the time to read materials and prepare well-thought responses, if the policy or decision document does not then say what you want it to. This is one of the points that came through clearly from this particular consultation.

As such, we hope that this document helps to explain how we have taken into account all comments, even if the final document does not fully reflect the points you made, and we hope that you will engage in future planning decisions in Oxford.

Summary of comments and actions or responses

General topic or section of the document	Summary of comment	Response or action
Principles for community involvement in planning decisions	Do more to engage those without access to the internet	The City Council's commitment to continue to provide for those who find it difficult to access material online has been emphasised in the SCIP. We will continue to provide alternative methods of communication/consultation for those without internet access, whilst balancing that there are also many benefits to online consultation methods (such as the ability to reach large numbers of people quickly and easily) and the SCIP also seeks to make the most of these opportunities.
	Over reliance on online consultation methods	
	Use plain, clear language	The SCIP already makes a commitment to use plain English, however a commitment to make planning policy documents clear and concise has also been added to the SCIP.
	More clarity, less lengthy documents	A commitment to do this has been added to the SCIP's overarching principals for community engagement.
	Be clearer about how consultation responses are considered and used	
	Consultation documents should be provided as black and white PDFs. Colour documents are hard to download and expensive to print.	No action required. We already provide the majority of consultation documents as PDFs, which are quicker to download. Colour documents are used to ensure that images and diagrams are clear, and to help break up long pieces of text. Documents are checked for clarity so that they can also be printed in black and white if desired.
	More innovative consultation ideas needed	A commitment to maintain awareness of current best practice and new and evolving methods of communication and consultation has been added to the SCIP. The SCIP aims to not be overly prescriptive so that the City Council or developers are not constrained, and to enable opportunities for innovation and to facilitate use of new ideas or best practice.

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	<p>The intention in the Community Engagement Policy to put collaboration at the heart of the planning process is not reflected in the SCIP. The SCIP is orientated towards consultation – getting people to agree to proposals already drafted. Collaboration is about bringing the community's knowledge into the process to create better proposals and better places.</p>	<p>The SCIP emphasises the importance of early community engagement in planning processes, with the aim of enabling a more collaborative approach to planning. Earlier engagement gives the greater scope to shape policies and development proposals. The City Council also strongly encourages developers to engage with communities early on in developing proposals.</p>
	<p>Other LPAs have been bolder in seizing the spirit of localism e.g. Lambeth has stated a vision of citizens, businesses and council working together on an equal footing, allowing citizens more direct influence over services. The SCIP's approach does not appear consistent with localism and NPPF.</p>	<p>It is an aim of the City Council to improve dialogue and consultation throughout Council processes, including planning. This is reflected in the SCIP but also in wider corporate strategies such as the Corporate Plan 2015-19, the Community Engagement Policy Statement 2014-17, and the Corporate Equality Scheme 2012-15.</p> <p>The Council is however keen to carry on learning from best practice in other authorities, and as new and innovative ideas emerge, as noted in the Action Plan. In particular through the review of the SCIP, a review was carried out to compare best practice in comparable authorities in terms of how they encourage developers to carry out effective pre-application engagement.</p>
Defining Oxford's community	<p>Clearly define the community.</p>	<p>A section has been added to the SCIP to explain the different notions of Oxford's communities.</p>
	<p>Current planning issues require the involvement of people and organisations outside the City but who live, work or operate within the City. This needs to be acknowledged and understood.</p>	<p>This has been taken into consideration when defining Oxford's communities, and in deciding who to contact about the consultation.</p>
	<p>Oxford's community is not homogenous. The SCIP is silent on how different groups can collaborate. Collaborative involvement of different groups will enable policies to better reflect community priorities and local needs; increased community commitment; stronger, more cohesive future communities and policies enhanced by local knowledge. Building relationships with representative groups is particularly important but how will this be done?</p>	<p>The Action Plan alongside the SCIP includes an item to review how we work with representative groups, particularly in the context that such groups may help to reach wider audiences and to raise awareness of consultations and planning processes.</p>

Planning policy - consultation methods	Present details as an online presentation so it can be heard, seen and read.	Opportunities to do this will be explored over the next 12 months, see the Action Plan for details.
	Page 11 of the Draft SCIP refers to the use of a 'variety of techniques'. An explanation of these techniques is needed. If this is to refer to techniques described in Section 6 on p14 or the Appendices, this should be made clearer in the final SCIP.	This section of the SCIP has been updated to clarify that a variety of consultation methods will be used as listed in Appendices Table 1.
	It is not sufficient for preferred options to be circulated informally to 'stakeholders' and it is not clear under what circumstances this would be considered appropriate. Such a vague statement should not be in the SCIP. All options should be made available for public comment.	This text has been amended in the SCIP.
	The Draft SCIP (page 14) refers to the use of charettes. Most people will not understand what these are. The statement itself says that plain English should be used so an alternative word is needed here. Where technical terms are unavoidable they need to be explained.	This section of the SCIP has been updated so that the word charette is no longer used.
	Consultation methods are ever only as good and effective as the care taken in listening to and applying the messages learned.	Ways to monitor and review the quality of consultations, as well as how we feed back the learning from consultations, will be explored over the next 12 months, see the Action Plan for further details.
	Provide feedback from consultation exercises.	The SCIP reiterates commitment to provide feedback and keep the community informed about progress and outcomes. There is also an additional action in the Action Plan, to explore how we can make it clearer to people how comments have been taken into account, and to encourage clearer feedback from applicants on major applications.
	Stop limiting response to a certain amount of characters	Different consultation systems permit different types of responses, and where we have the option to limit characters then we try to balance this with the type of question. However there is always the option to submit letters by email or in the post, if someone feels that the consultation questionnaire form (or online version) is too restrictive in length of response.

Planning policy – early engagement	<p>Early public involvement provides opportunities for communities to initiate ideas. Early consultation will give people more time to consider the issues.</p>	The SCIP promotes early engagement in the preparing of planning policy documents (as well as planning applications).
	<p>Consultations should take place before plans are agreed, rather than after.</p>	The SCIP promotes early engagement in the preparing of planning policy documents, in addition to consultations on draft versions of plans.
	<p>The Draft SCIP states that early consultation should be proportionate but it is not clear how it will be determined who should be involved at the early stages of policy formulation. An attempt has been made to show an example of how early public involvement would be undertaken and this is welcome but perhaps could be expanded to give assurance that all interests will be considered (pages 11 and 12).</p>	The SCIP has been amended to highlight the new commitment to produce a bespoke consultation programme for each local plan document. The programme will be agreed by the authorising City Council body when embarking on new planning policy documents. Those consultation programmes will specify the key groups that we will aim to involve at each stage of document preparation, and how.
	<p>Publishing a consultation document before informal consultation/dialogue may be seen as pre-empting free discussion. It would be better if this were changed to: 'This will be wide-ranging and involve asking questions about what the document and policies should include.'</p>	Text changed in the SCIP.
Planning policy – handling consultation responses	<p>The council is quite good at getting feedback on policy documents. It is less good at handling such feedback, and demonstrating that feedback has been taken into account. A lot of goodwill is lost by inadequate feedback to feedback.</p>	The SCIP makes a commitment to provide feedback and keep the community informed about progress and outcomes. Exploring new ways to provide feedback on planning policy consultations is also included the Action Plan, to be explored further over the next 12 months.

	<p>Preferred options should derive from consultation and not be the preferred Council options, unless no comments are received from the public. When options are published the actual number of responses in favour of a particular policy should be given rather than the percentage of the responses received so that the number supporting an option is clear.</p> <p>Pre-submission collating of comments should accurately reflect the comments made. Unfortunately, on occasions in the past local residents have considered that there has been a rather selective process giving emphasis to the Council's views.</p>	<p>SCIP has been amended to set out a commitment to be clearer about how consultation responses will be used, and to explain the issues that can and cannot be taken into consideration. This matter is also identified for further exploration via the Action Plan.</p>
Planning Policy – general comments	<p>For the Annual Monitoring Report to review community involvement there needs to be some consultation with representatives of the community. For the results of monitoring to be credible, it should not be conducted internally by the Council but also involve some independent scrutiny.</p>	<p>The AMR is a factual document, and the section about the SCIP primarily assesses whether the procedural requirements of the SCIP have been complied with. Data relating to the quality of consultations has recently been added to the AMR (2013/14) and this information is taken from consultation feedback forms completed by members of the community.</p> <p>In addition the Action Plan contains a commitment to explore other ways of monitoring and reviewing the success of consultations.</p>
	<p>An indication of the anticipated timescales involved in policy document preparation, as a whole, would be helpful.</p>	<p>Timescales for planning policy document production are provided in the Local Development Scheme, which is published on the City Council website. It is difficult to give indicative timings for the various document types because they vary so much depending on the topic.</p>

	<p>The SCIP doesn't discuss the roles of Councillors (i) should they be encouraged to play an active part in area committees and neighbourhood forums so as to help the local community to articulate its views; (ii) should Councillors advise the most appropriate methods for public involvement for their wards and for the authority as a whole; (iii) should there be awareness training for elected members on the most frequently used consultation techniques, and particularly how to interpret the results? It would be interesting to know the extent to which Councillors have been involved in the preparation of the draft SCIP.</p>	<p>The SCIP encourages developers to inform ward councillors of developments in their wards at the pre-application stage, so that ward councillors can notify relevant local groups and actively encourage engagement in planning processes. Councillors will also be involved in agreeing the consultation programme for each policy document, because the SCIP includes a commitment for the authorising City Council body to agree a bespoke consultation programme for each new planning policy document. There is a Members code of practice, and Members are also offered regular training opportunities which often cover consultation-related issues (as referenced in the Action Plan). Members have been involved throughout the preparation of the SCIP, including CEB, scrutiny committee, and workshops.</p>
	<p>The reference to Sustainability Appraisals on page 9 should contain an explicit reference to air quality.</p>	<p>Sustainability Appraisals consider a wide range of issues so it would not be appropriate in this particular instance to start listing specific aspects of sustainability.</p>
Neighbourhood Plan processes	<p>The SCIP could say something about why the Neighbourhood Plan process has had a slow start in Oxford, what obstacles exist and what ways are recommended to overcome the obstacles?</p>	<p>Whilst the consultation elements of the neighbourhood planning process are discussed in the SCIP, it is not for the SCIP to comment on the progress to date of any of the emerging neighbourhood plans. The Annual Monitoring Report provides a general progress update instead, or there is information about each plan on the website.</p>
	<p>The diagram on page 10 is mostly a representation of a cascading process. If Neighbourhood Plans are to be successful in exercising powers under the Localism Act they must contribute to any Local Plan documents; their implementation, any revisions, and in the formulation of new plans. There needs to be an arrow upwards from the Neighbourhood Plans to the box containing the Local Plan documents.</p>	<p>The diagram has been updated.</p>

Consultation undertaken by developers	More involvement with local residents at the pre-application stage.	The SCIP encourages developers to engage with the community at an early stage of major planning applications, especially pre-application stage.
	Wider advertising of pre app consultations, wider leafleting, information sessions etc.	There is no statutory requirement for developers to undertake pre-application consultation, however guidance has been produced alongside the SCIP (see the help sheets) which suggests ways that developers can effectively engage with the community, in particular ways to help people visualise what the proposal would look like.
	Consult all local residents/interested parties not just those in immediate vicinity.	If a scheme falls within the definition of a 'major' development, developers are encouraged to engage with those who live, work and/or undertake other activities in the surrounding area who may be affected by the proposals. It is difficult to set a specific distance or geographic area, because the engagement needs to be appropriate to the proposal and the areas that its likely to impact. An alternative, for interested parties, is to sign up to planningfinder, to receive automatic notifications of developments in your selected postcodes.
	Developers should be required to contact all local residents/amenity groups not just encouraged to do so.	
	Involve community through planning performance agreements.	Planning Performance Agreements are agreements between the City Council and the applicant, so it would not be appropriate to involve third parties. However the SCIP does set out that in some cases it may be required as part of a Planning Performance Agreement (where applicable).
	Visual aids such as maps and models are a very good idea (e.g. Barton Park and Westgate) but most developers don't bother.	Alongside the SCIP, a help sheet has been produced to encourage developers to use visual aids, and sets out examples of different visual aids and best practice that they should consider using when undertaking consultations. Whilst we can't require them to be used, the SCIP encourages them.
	Developers should be required to minute meetings and respond to issues raised.	As there is no legal requirement for developers to undertake consultation in most cases we would be unable to enforce this. However, the SCIP encourages developers to submit a statement explaining how they have undertaken consultation and how they have responded to any issues raised in the final version of the design. This feedback could include minutes of meetings.

	Developers should ensure they are complying with building regulations when developing plans to avoid post-application changes	Building Regulations are outside of the remit of the SCIP, however we do advise applicants of the need to be compliant with the Regulations at an early stage.
Pre-application procedures	Pre-app advice should be given by a different officer to the one who decides on the application to increase transparency.	Applications are allocated to officers based on a number of factors including caseload and experience. Normally the same person who gives pre-application advice would be allocated to handle the application for consistency.
	Pre application transparency - let people know what has been advised during pre-app.	Pre-application advice is on a confidential basis. The applicant may wish to reference it in the application, but it cannot be required.
Consultations on planning applications	More engagement is needed with local people / engage with a wider range of people.	The SCIP encourages engagement with a range of people appropriate to the application. There is also an action in the Action Plan seeking to engage with a wider range of people that may not typically be heard in planning consultations.

	Re-instate letters to notify neighbouring properties	<p>Great consideration has been given to whether the City Council should re-introduce sending neighbour notification letters inviting comments on new planning applications. Such an option may be welcomed by many residents however it is not without its costs and some risks. The cost of re-introducing such letters is estimated in the region of £45,000 per year, and even when the Council formerly operated this procedure it still attracted complaints because some neighbours expected the extent of notification to have been wider and because they thought they could only comment if they received a letter.</p> <p>The City Council is therefore looking to a range of mechanisms to consult neighbours and residents in close proximity to a proposed development. The planning service already makes extensive use of site notices, the web, and internet alerts such as PlanningFinder and the Council's weekly list of applications. The new Council 'App' will extend the options further and enable a more personal service to be accessed by local residents, landlords, and others. The SCIP also confirms that the opportunity remains to view paper plans at the main St Aldates Reception and to use public computers to access the web here and at public libraries.</p>
	Inform local residents associations so they can inform local residents, planning notifications often missed.	There is an action in the Action Plan to explore how we can work with residents groups and other organisations, as a means of raising awareness about planning consultations, and encouraging people in that group, or their contacts, to get involved in planning decisions.
	More communication methods, not just online.	The City Council's commitment to continue to provide for those who find it difficult to access material online has been emphasised in the SCIP. This approach will also be encouraged of developers.
	Better consultation relating to revised plans and other changes during the application process.	Consultation on plans that are revised by the applicant mid-way through a planning application being determined will be done in a way that is proportionate to the changes proposed. In some cases re-advertisement (with pink site notices, instead of yellow ones) may be required if the changes impact significantly.

	<p>Site notices – unreliable, not well posted, too few, not displayed for long enough, easily missed, easily removed, insufficient.</p>	<p>Standardised procedural guidance has been produced for officers putting up site notices (see Action Plan item). A summary of the guidance is also published on the website.</p>
	<p>Officer reports do not adequately reflect public comments (concerns are generalised and are therefore open to misinterpretation). This also means that committee members are not fully informed.</p> <p>Objections to applications are often all lumped together and dealt with by the bland statement that they can be mitigated by the imposition of suitable conditions. The 'conditions' listed are often not conditions at all (e.g. "Samples in Conservation Area"). We would like to see submitted comments listed in the report and a much clearer outline of the conditions imposed when recommending approval.</p>	<p>There is an action in the Action Plan to review how public comments are dealt with in committee reports, in response to comments that people say they are not clear. The review will be carried out over the next 12 months.</p>
Planning application procedures	<p>Consultation responses from Conservation Officers should be publically available.</p>	<p>The City Council's position on an application is drawn from a range of professional experts, including Conservation Officers, so it is appropriate to publish the combined views. This is also normal practice for local planning authorities.</p>
	<p>Public comments should be retained on the website after a decision has been made.</p>	<p>After an application has been decided, then public comments are classified as sensitive information, and therefore are removed from the website. This is standard practice in local planning authorities.</p>
	<p>Make the decision making process clear to all - applications can be called into committee if requested by four councillors, people should be aware of this.</p>	<p>The SCIP includes a summary of the planning application assessment process, but if further information would be helpful then it could be a topic for future help sheets.</p> <p>The Government website Planning Portal also explains the planning system overall, in a section aimed at the general public. http://www.planningportal.gov.uk/planning/planningsystem/</p>

Be clearer about what constitutes a 'major application'	<p>The definition is determined by national policy, so a footnote has been added to explain that “At the time of writing, major applications are defined by Article 2 of the Town and Country Planning (Development Management Procedure (England) Order 2015”.</p> <p>The Article can be viewed online http://www.legislation.gov.uk/uksi/2015/595/article/2/made and includes criteria such as 10 or more dwelling houses, a site area of greater than 0.5ha for new dwellings (or 1ha for other uses), or new floorspace of greater than 1000sqm. This is however subject to change, so to avoid the SCIP becoming out of date then the definition has not been repeated in the SCIP itself.</p>
Also highlight what is not a material consideration.	<p>We have produced a help sheet on the website providing more detailed information on what is and is not a material consideration, to help people when commenting on planning applications. A link to this is now provided within the SCIP.</p>
<p>Obtaining information about when applications are to be considered by committee is inefficient and unreliable. The City Council advise applicants but not those who submit comments. Even those answering the phone at the planning office may be unable to provide accurate information and advice. This situation is obviously unsatisfactory and distressing.</p>	<p>The dates of all committee meetings are published on the City Council website in the ‘Calendar of meetings’, and planning committee meetings tend to be scheduled 6-12 months in advance. Normal practice is then for the agenda to be published on the website at least 5 days in advance of the meeting.</p> <p>Sometimes if the case officer is still awaiting information up until the date the report needs to be published, then an application may need to be moved to a later planning committee date, but once the agenda is published then the applications to be considered at that committee date do not normally change. Officers answering telephone queries are therefore similarly advised to refer to the agenda on the website.</p>

	Major applications can generate large numbers of documents. These need to be more clearly named online.	Noted, and training is being undertaken to ensure planning application documents which are uploaded by the City Council are clearly labelled. For planning applications that are submitted by the applicant via the Government's online ('oneapp') system, then the applicant generates the labelling but we are working to see how this can also be improved to make it easier for the public to find the documents that they are looking for, especially on major applications with many documents.
Planning appeals	Hearings/inquiries are held during working hours so are difficult to attend for some people.	Planning application hearings and inquiries are scheduled by the Planning inspectorate. This is beyond the control of the City Council. However to ensure that people are not disadvantaged, the planning inspector will normally permit written reps or a substitute representative if a required speaker is unable to attend the date/time.
	Where the Council's recommendation has been challenged, the Council's case should be prepared and presented by an independent planning consultant.	In the event that a planning application decision is appealed, then normally the case officer will continue to deal with the case. The exception to this is if the planning committee has disagreed with the planning officer's recommendation to such a degree that the case officer feels their professional integrity would be challenged to then defend such a change in position.
	The process works well enough (it uses postal communication!). We would like to have more clarification on how appeal decisions are taken into account when assessing later applications for a particular site. E.g. there has been an example in Quarry where a recommendation for approval for a planning application appears to contradict the principles established in a previous appeal decision refusing development for the same site.	A case officer will always consider the planning history of a site as part of the decision-making process, such as previous City Council decisions and any Planning Inspectorate or legal decisions, which may have established key principles. The decision may not necessarily follow the same path though if, for example, the proposal has changed significantly, or if the policy (national or local level) has changed significantly since the previous decision.

Online consultation systems	A number of comments were received relating to problems experienced when trying to use our online systems for consultations and viewing documents (PublicAccess, PlanningFinder, Inovem).	Alongside the SCIP an Action Plan sets out a number of ways that we are working to ensure that the IT systems which support engagement in planning are fit for purpose and user-friendly. As part of this we are looking into the specific issues that people referred to in their comments on the draft SCIP.
Helps sheets to support the SCIP	Help sheets and supplementary guidance are useful but there needs to be a more joined up approach which helps to guide users through the enormous amounts of information available. The OCC Heritage Portal is a good example of this.	Supporting online access to planning information is included in the Action Plan to improve navigation of the City Council web pages which are now reviewed at least 6 monthly, and more frequently where appropriate. This includes links to the Character Assessment Toolkit pages as well as other specialist pages. The City Council has also engaged user testing to improve the web pages.
	Provide links to the Oxford Character Assessment Toolkit which was developed as a community engagement tool for the City Council, developers & architects to use when considering development and to inform decisions about managing the environment.	
	These all seem good but we would like to see some documents updated in line with consultation responses.	The SCIP and supporting help sheets have been updated to take into account the consultation responses received, as explained in this Public Involvement Statement.
	Paper copies should always be provided too.	Tables 1 and 2 of the SCIP affirm our commitment to provide paper copies of policy consultation documents at appropriate deposit points in the city (such as libraries and St Aldate's Chambers). The SCIP also states the ways that we will make paper copies of planning applications available for inspection.
Suggested help sheet topics	A guide on what can and cannot be done at different stages of the planning process. Planning hearing/inquiry/examination processes/order of proceedings.	The SCIP includes a summary of the planning application assessment process, but if further information would be helpful then it could be a topic for future help sheets. Also the Action Plan includes an action to trial a newsletter, which could help to explain the planning processes too. The Government website Planning Portal also explains the planning system overall, in a section aimed at the general public. http://www.planningportal.gov.uk/planning/planningsystem/

	Contextual information plus more electronic visualisations.	A help sheet has been produced alongside the SCIP, to guide developers in ways of presenting information that will help members of the community to visualise development proposals.
View planning information at our main offices (St Aldate's Chambers or city libraries)	Viewing paper copies of plans is more difficult now that an appointment has to be made in advance. In the past a paper copy of every application was available in reception for public access.	It is no longer possible to make paper copies of every application available in reception due to practical space limitations. In addition, a significant number of applications are now submitted online. Therefore people are encouraged to view applications online via Public Access, either at home or using the computers in St Aldate's Chambers, however paper copies are still available to view upon request.
	Further attention should be given to the number, location and opening times of places described as deposit places.	A help sheet has been produced alongside the SCIP to list all of the deposit points. By publishing the list separately to the SCIP then it can easily be kept up to date if addresses, or opening times, of venues change.
	Also necessary is the ability to discuss plans with planning officers.	Appointments can be made to discuss plans with case officers upon request. In some cases a pre-application advice fee may apply.
	<p>There is only a small area at the rear of St Aldate's Chambers where groups can view planning applications. Larger groups have to split up, with some using the smaller computers at the front. This means frequent visits across the office, causing disturbance and distraction. The small monitors at the front of St Aldate's Chambers do not enable proper appreciation of complex drawings.</p> <p>One of the three computers at the rear of St Aldate's Chambers was not working for several weeks, despite repeated reporting to staff. There are issues of equipment reliability and systems maintenance/fault rectification.</p> <p>The computer systems are unresponsive and slow. We have complained repeatedly of these failings but we have seen little sign of commitment to improvement.</p>	This feedback has been noted and actions have already been taken, including adding an extra computer and larger screens in the public area. This is also identified in the Action Plan as an issue to keep under review, to ensure that the area is a customer-friendly option for people to view documents or make comments.

Engaging with a wider range of people from all across the city	Engage with more representative groups	The Action Plan includes an item to review how we work with representative groups, particularly in the context that such groups may help to reach wider audiences and to raise awareness of consultations and planning processes.
	Seek advice on this from outside sources such as Brookes business school, to try and receive some new, fresh innovative ideas. How about involving students from the universities? Good practice and worthwhile projects for them and hopefully good ideas/feedback for the City Council. Use the strength around you.	The Action Plan alongside the SCIP includes an action to explore working with existing networks and forums – which could include the universities where they have innovative experience of consultations. They could also potentially feed into the action in the Action Plan about setting up a reference group.
	A permanent display all current/upcoming developments in the Town Hall	Noted. This is being explored as something that could potentially be accommodated in the self service area at St Aldates's Chambers. It is also something that we hope publishing a regular newsletter will help to address.
	Newspaper ads expensive and misused. Contact more residents directly, local organisations, local publications, local TV/radio - youth groups and schools to engage children in planning developments in their patch.	The Regulations require that some types of planning application are advertised in local newspapers. In Oxford this is The Oxford Times newspaper. In addition we aim to use a range of different methods to reach as many people as possible, and the Action Plan includes an action to explore more use of social media to engage people.
	Involve neighbouring Parish Councils and residents from the District Council parishes sharing a boundary with the City.	Local authorities and parish councils adjoining an application site, or area covered by a policy document, will normally be consulted. We would also encourage those bodies to let their local residents know.
	Involve people in conjunction with Councillors: at the moment the public's perception is that the Councillors are merely go-betweens.	Ward councillors are notified of any application in their area, or policy document consultation. The SCIP also encourages applicants to engage with the relevant ward councillors so that they can help to raise awareness of the proposal locally in case people want to make comments. There is also regular training available for members if they want to engage more with the planning processes.

<p>Heavy reliance on online methods, even if someone wanted to visit a deposit point they have to find opening times etc. online! Local groups would be happy to provide additional deposit points outside library/office hours.</p> <p>The proposed and existing methods of communication rely substantially on the internet which excludes all those without access to, or ability to use, the internet. Arrangements should be made so that these people are not excluded.</p>	<p>The City Council is required to meet Regulatory requirements in terms of where and how documents are displayed, so if a document is not available as advertised then there is a risk that we could be subject to legal challenge. However this suggestion and offer of assistance could have benefits to availability and will be explored to better understand the legal implications of making documents available via alternatives to the regular deposit points.</p>
<p>Identify who needs to be involved at what stage.</p>	<p>The SCIP introduces a new requirement for a bespoke consultation statement to be produced whenever the City Council embarks on a new planning policy document. This will set out who needs to be involved at each stage as appropriate to the issues under consideration.</p>
<p>Think about how the Oxford Student Community Partnership Group can be used.</p>	<p>The Action Plan alongside the SCIP includes an action to explore working with existing networks and forums - such as the Oxford Student Community Partnership – to facilitate engagement with the planning process.</p>
<p>Engage with key stakeholders/representative groups in advance of consultations to provide them with advance warning and to seek views on the most effective methods.</p>	<p>The SCIP encourages that consultation should start as early as possible to give people the opportunity to participate and contribute ideas. Particularly for policy documents, it also encourages more on-going dialogue and to shift away from only consulting key stakeholders/representative groups, so this will be one way that people have more advance notice of the direction that planning processes are heading.</p> <p>We will also be trialling a planning newsletter, to help to keep people updated in between formal consultation periods.</p> <p>The Action Plan also includes an action to explore setting up a user group for major consultation methods, to help shape future consultation events.</p>

	<p>City Council should carry out a rolling programme of education on planning process within local communities. This could involve annual half day workshops for interested residents in each part of the City. One was held in Highfield a few years ago and it was very well received. It would enable more effective participation.</p>	<p>The Action Plan alongside the SCIP notes the importance of building capacity and knowledge in communities, to engage effectively in planning processes, and this is an objective for several of the proposed actions. We will explore working with community groups, and also with colleagues in the City Council's regeneration areas, to review the best ways to achieve this. Its likely to be via a combination of methods depending on the target audience and their preferred way of engaging.</p>
Resources for consultation	<p>The new emphasis on community involvement will require substantial investment in building and deploying skills. A bigger effort made in the early planning stages will result in savings later on. Planners must avoid commitments to public engagement that can/will not be funded. The RTPI recommends that SCIPs should be costed and an estimated budget calculated for at least 3 years ahead. The current draft SCIP will need a lot more detail before costing can be accurate. Ways of undertaking collaborative work with the public could include: cost sharing with other departments; liaison with other departments undertaking consultation/public involvement to reduce duplication/overlaps (why was the Community Engagement Policy consultation and the SCIP consultation undertaken separately?) and Council departments and other agencies working together to build and maintain an accurate database of representative groups as part of a single stakeholder database.</p>	<p>The SCIP has taken account of the predicted budget available for the Planning service over the next few years.</p>

Other comments relating to the SCIP	There should be stronger links between the SCIP and the Heritage Strategy to ensure a joined up process. The Heritage Plan and its commitment to an SPD should be included within the SCIP, as well as a commitment keep updated the Heritage Portal so that there can be no doubt that heritage is an integral part of planning and policy in Oxford and not a specialist area. We would like to see cross-reference made to the heritage plan framework and its role within the planning process.	The Action Plan includes an action to keep the web pages under regular review, so part of that will include ensuring better links across the pages for different planning topics, including linking in with the Heritage Strategy and Framework.
	Biodiversity, hydrology, flooding, Oxford's green setting, over-development by huge institutions - these are all issues where the planning policies are failing Oxford's residents. This draft document does not address these issues.	These issues are discussed in other policy documents. The SCIP covers consultation procedures and this comment seems to be referring to technical planning merits of decisions rather than the consultation processes.
	Highlight how the community can engage with other agencies such as Oxfordshire LEP.	The SCIP is produced by the City Council and sets out requirements related to City Council planning processes. It is not appropriate for the SCIP to make commitments on behalf of other organisations for their engagement with the public unless it relates to a planning application they have submitted.
	Hard copies of documents should be available free of charge on request so that non-computer literate people, often the elderly and less well-off, are not excluded.	Paper copies of policy consultation documents are made available at relevant deposit points throughout the city. Paper copies of planning applications are available to view at the City Council's main offices (St Aldate's Chambers).
	Embrace social media.	Ways to utilise social media in planning consultations will be explored over the next 12 months, as set out in the Action Plan.