

Appendix G

Encouraging Developer-led Community Engagement in planning applications: Comparison of approaches taken by other authorities

Statutory requirements and national guidance

There is no statutory requirement for developers to undertake pre-application consultation. However, there is clear support for early community engagement in the National Planning Policy Framework, as Paragraph 66 states: *“Applicants will be expected to work closely with those directly affected by their proposals to evolve designs that take account of the views of the community. Proposals that can demonstrate this in developing the design of the new development should be looked on more favourably”*. This support is then echoed in the National Planning Practice Guidance.

It should be noted that the Planning Portal, which provides guidance on preparing and submitting planning applications, has no current guidance or information on community involvement.

Reason for research

This document summarises a review undertaken to look at the approaches of other local planning authorities in terms of their requirements or guidance provided for developers to engage with communities at either the pre-application or application stages. The research was undertaken in order to help us understand the different approaches available and to enable us to benchmark our approach against other authorities to help ensure that we are delivering high standards of engagement.

It should be noted that the research was based on publically-available information obtained from the authorities’ websites only, on the basis that the website would be the most likely initial source of information that developers would look to prior to any pre-application meeting.

In undertaking this research, we looked at broadly comparable planning authorities (small-medium city-based authorities). The table below summarises our findings and identifies where there may be lessons we could learn. Bristol provides some particularly interesting ideas for developer-led engagement, although it should be noted that some of the proposals are only in draft form and further monitoring would need to be undertaken to establish how the requirements stand up to challenge at appeal or legal cases.

Summary of findings about the approaches of other planning authorities

Local planning authority	Any clear requirements or guidance for developer-led community engagement set out on the website?	Other relevant information
Bath and North East Somerset	No specific pre-app consultation requirements or guidance relating to community engagement.	
Brighton & Hove City Council (unitary)	<p>Pre-application advice sometimes includes guidance for developers on undertaking community engagement. No specific requirements for developers, broad 'recommendations' only.</p> <p>Sources of Information: http://www.brighton-hove.gov.uk/content/planning/planning-applications/pre-application-advice http://www.brighton-hove.gov.uk/content/planning/planning-applications/pre-application-advice-service-small-scale-applications</p>	
Bristol City Council	<p>A Community Involvement Statement must be submitted with all major planning applications. (It is a validation requirement.) It is therefore clearly expected that developers involve the local community at the pre-application stage. Furthermore the Community Involvement Statement must be signed by both the applicant and community if agreed (each can submit their own statement if not agreed).</p> <p><u>Guidance about how to do a Community Involvement Statement:</u> http://www.bristol.gov.uk/sites/default/files/documents/planning_and_building_regulations/planning_applications_and_process/Guidelines%20for%20Pre%20application%20involvement%20-%20update%20Jan%202015.pdf</p> <p><u>Template Community Involvement Statement:</u> http://www.bristol.gov.uk/sites/default/files/documents/planning_and_building_regulations/planning_applications_and_process/2011-community-involvement-record-cis_0.doc</p>	<p>Website says their SCI currently being updated too, so might be interesting to see how changes. http://www.bristol.gov.uk/page/planning-and-building-regulations/planning-statement-community-involvement</p>

	<p>Provides a guidance note for developers on community involvement in the pre-application process.</p> <p>Bristol also has a 'Neighbourhood Planning Network' which is a self-help network of independent, voluntary neighbourhood groups who want to be involved in planning in the city. The network acts as a conduit for early developer discussions with the community.</p> <p>Bristol City Council has also additionally set up 14 Neighbourhood Partnerships which aim to involve local people in decision making.</p>	
Cambridge City Council	<p>Consultation not specifically mentioned on the planning application homepage.</p> <p>The only advice on developer-led community engagement seems to be contained within a pdf download on pre-application advice in general, and is very brief:</p> <p>3. Community Involvement</p> <p><i>We encourage community involvement in the planning process at an early stage, before an application is submitted. This may take the form of discussions with neighbours, a local exhibition, public meeting, circulation of leaflets, or the creation of a well-publicised dedicated website, including a facility to make comments.</i></p> <p><i>The case officer can advise you of community groups that are likely to have an interest in the proposal. Third party comments should be considered before formalising a proposal and any application, which has undertaken pre application consultation with a community group, should set out the details of the consultation process and how the application has responded.</i></p> <p><u>Source of Information:</u> https://www.cambridge.gov.uk/sites/www.cambridge.gov.uk/files/documents/pre-application-advice-guidance-ed.pdf</p>	

Camden Council	<p>Encourage pre-application engagement through an offer to facilitate public meetings for local residents through DM forums to allow applicants to present their proposals as part of the pre-app process.</p> <p>https://www.camden.gov.uk/ccm/navigation/environment/planning-and-built-environment/planning-applications/?;jsessionid=DC39807B626CBC45CD4A271F668F2801</p> <p>and</p> <p>http://www.camden.gov.uk/ccm/content/environment/planning-and-built-environment/two/major-developments/development-management-forum.en</p> <p>Also facilitate ‘Developers’ briefings’ for applicants to explain to members at early stage https://www.camden.gov.uk/ccm/content/environment/planning-and-built-environment/two/planning-applications/before-you-apply/developers-briefings/</p>	
Reading Borough Council (unitary)	No specific pre-application consultation requirements or guidance for developers on the website.	
York City Council	<p>No specific pre-app consultation requirements or guidance for developers on the website.</p> <p>Source of Information: http://www.york.gov.uk/info/200388/planning_applications/343/viewing_and_commenting_on_a_planning_application</p>	

Authorities with no specific mention of developer-led community engagement on their websites during this research

Bath and North East Somerset Council: <http://www.bathnes.gov.uk/services/planning-and-building-control/apply-planning-permission>

Birmingham City Council: <http://www.birmingham.gov.uk/cs/Satellite/preappadvice?packedargs=website%3D4&rendermode=live>

Haringey Council: <http://www.haringey.gov.uk/housing-and-planning/planning/planning-applications/how-make-planning-application>

Reading Borough Council: <http://beta.reading.gov.uk/planningadvice>

City of York Council: http://www.york.gov.uk/info/200388/planning_applications/343/viewing_and_commenting_on_a_planning_application

Conclusions and lessons learnt

In general, it was found that many authorities do not seem to have any published information on their websites that mentions community involvement at the pre-application stage. Oxford's strong encouragement of pre-application engagement by developers, and the provision of detailed guidance, means that we are already ahead of many other authorities in this respect.

Some authorities do have a general reference to pre-application consultations in their Design & Access Statement guidance, but this tends to be fairly vague, leaving it entirely up to the developer if they wish to engage with the community or not. For example, one authority's guidance states: "*state what, if any, consultation has been undertaken on issues relating to access to the development and what account has been taken of the outcome of any such consultation*" [emphasis added].

From the examples of good practice that were identified, the following lessons can be learnt:

Pre-application guidance

- Our approach of strongly encouraging developers to undertake community engagement at the pre-application stage needs to be embedded in our pre-application guidance, including the text on our website. Our pre-application [webpage](#) already highlights the importance of community engagement (second paragraph), and links to guidance on how to help the community understand development proposals, and this already goes further than many other authorities. However, we could improve this by adding a link to the Statement of Community of Involvement on this page to emphasise this responsibility and to clarify our policy.
- We could also prepare a more general note about 'community involvement in the pre-application process' to spell out the benefits of early community engagement and the need for a developer to explain not only what consultation they have undertaken, but also how this has influenced their proposals. Bristol note is good example http://www.bristol.gov.uk/sites/default/files/documents/planning_and_building_regulations/planning_applications_and_process/Community%20involvement%20in%20the%20pre%20application%20process.pdf
- We could also add a paragraph targeted at the community 'what to do if you want to get involved at pre-app stage'

A greater role for community groups

Bristol council set up Neighbourhood Partnerships as a channel for views. We already have (online) Neighbourhood Discussion Forums – need to look into whether these could do a similar role, and whether we should be promoting them more to developers. Also note that currently they don't cover the whole city, only Central south/west, Headington/marston, or Cowley.

http://www.oxford.gov.uk/PageRender/decN/Neighbourhood_Discussion_Forums_occw.htm . We also have Area

Forums http://www.oxford.gov.uk/PageRender/decCD/Area_Committees_occw.htm but

unclear how these relate to NDFs and what the different roles are, or which would be most useful for applicants to engage with.

On similar lines Camden facilitates forums for developers to bring pre-app schemes to local community for discussion, but this seems to be more authority-led (with implied resource implications).