A Snapshot of Pre-application Community Involvement in the Planning Process in England

10 Years of the 2004 Planning Act

**Compiled on behalf of the Bristol Neighbourhood Planning Network
by Joseph Wood, Summer 2013**

Contents

INTRODUCTION

It has been almost 10 years since the Planning and Compulsory Purchase Act (2004) required local authorities to create a Statement of Community Involvement, outlining, in part, how the local community would be included in the processing of planning applications. It is clear that during this time community involvement (CI) has become more commonplace in the UK.

More topically, the Localism Act and National Planning Policy Framework (NPPF) have added to what is still only encouragement, but which may in some cases become a statutory requirement, for more and better pre-application community involvement. There are several mentions in the NPPF encouraging community involvement, most notably paragraph 66 which states that:

> "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."

The Localism Act introduced the intention (subject to secondary legislation) to make pre-application community involvement a formal requirement for certain sizes and types of project. Related statements suggest that this may only apply to projects of over 200 houses or 10,000 square metres and, as of now, there has been no progress even on the consultation on the secondary legislation. [1]

This report aims to highlight the different approaches to CI taken by various authorities in England, and to analyse the effect they have on the quality of the involvement that they produce. Through this analysis we may find examples of policy and procedure that could be utilised by other authorities in order to get the most out of community involvement in planning. As will be seen, the effectiveness of CI in planning varies from region to region.

Looking predominantly at some of the largest core cities in England, the report outlines the strategies taken by each authority and suggests where these strategies have either become strengthened or weakened over time. Case studies have been used to show how the policies and procedures of each city have influenced CI. Community involvement which takes place prior to an application being submitted has been focussed on in particular. Although the public consultation process after a planning application is submitted is much the same in each authority, this report highlights how the implementation of pre-application community involvement (pre-app CI) differs more, and how the methods through which they are implemented work to varying degrees of success.

Early engagement was one of the government's objectives in its review of the planning system in 2004, and the 'front loading' of CI has been shown to produce the best results; allowing any issues that the public have with a proposal to be addressed during the design stage rather than afterwards produces fewer delays after submission, and generates schemes which are more likely to be welcomed by the community.

The Neighbourhood Planning Network has been monitoring CI in Bristol for a number of years. It would now like to compare practices in Bristol with those elsewhere in the country. The summaries and case studies in the following pages aim to give a snapshot of community involvement in England today, and to show where the most effective work is being carried out.

---

1. On all of the above, see also "Collaborative approaches to development management?" by Jeff Bishop. TCPA Journal, February 2013.

METHODOLOGY

- The criteria used to assess and comment on each authority example and case study are those of the author, although they were developed from some in more general use and from experience in Bristol.

- Public (and published) material from each authority was studied and used, for example any Statement of Community Involvement, toolkit or guidance.

- Contact was made with at least one officer in each of the 8 authorities studied, from which further information emerged, for example to generate the case studies.

- Positive case studies were sought for in each authority, where possible, to illustrate how the policies of each authority could benefit pre-app CI. These were either provided by the contacted authority or through accessing public information. Where there was an apparent lack of effective pre-app CI, negative case studies have been used to illustrate this. Again, these examples were either provided by the contacted authority or through accessing public information.

- Some case studies were provided by the contacted officers, some by accessing public information.

- The case studies have not been checked with or signed off by the relevant authorities.

- In summary, it is important to make clear that this report is the outcome of a personal study by the author and all judgements are his alone.

Comparison of Policies on Pre-app Community Involvement in UK Planning Authorities

	Bristol	Leeds	Manchester	Nottingham	Birmingham	Sheffield	Newcastle	Liverpool
Statement detailing pre app CI required as validation doc. for major development	✔	✔	✘	✔	✔	✔	✔	✘
Statement detailing pre app CI required as validation doc. for development with community significance	✔	✔	✘	✘	✔	✔	✘	✘
CI encouraged at early stage	✔	✔	✘	✔	✔	✔	✘	✘
Authority facilitates contact between developer and community at early stage.	✔	✘	✘	✔	✘	✔	✘	✔
Guidelines on CI provided by local authority	✔	✔	✘	✔	✔	✔	✘	✔
Continuity of CI participants encouraged	✔	✘	✘	✔	✘	✔	✘	✘
CI Statement produced jointly by developer and community representatives	✔	✘	✘	✘	✘	✘	✘	✘
Any local organisation assisting community groups in planning matters	✔	✘	✘	✔	✔	✘	✘	✘

BRISTOL

Overview

- The Statement of Community Involvement produced by Bristol Council outlines a number of steps to ensure that communities are more involved in planning decisions.
- The planning authority has a strong commitment to community involvement in planning, which goes beyond advice to developers, and is now standard policy.
- A Community involvement Statement (CIS) is required for all major planning applications and there is a system in place to initiate and facilitate the process at an early stage.
- Meaningful pre-app CI is much more commonplace and effective in Bristol than in any of the other major cities in England.
- The Neigbourhood Planning Network, a volunteer organisation, is very active in improving pre-app CI.
- Developers working often in the Bristol area are becoming familiar with the process, and as a result pre-app CI is becoming more and more effective.

Strengths

- A CIS is required for all major planning applications (defined as a 1,000m^2 development, or 10 or more residential units).
- Early engagement is enabled through a standard protocol after pre-application talks. Developers are referred to the Neighbourhood Planning Network who facilitate an early dialogue between the applicant and community groups, and help to develop a programme of consultation.
- Bristol has a large number of existing, well-informed planning groups. The NPN has contact with all of these groups and, where none exist, it attempts to form one in order to partake in CI for major developments.
- CI is encouraged to include more than just the immediate neighbours of a proposal - who are more likely to oppose development on their doorstep.
- A strong set of guidelines are available from the planning authority which aim to produce the best results from a consultation process. For example, it is suggested that repeat meetings with the same participants are essential as the scheme develops. Repeat meetings now happen regularly on major planning applications, with better end results being observed.
- Guidelines encourage developers not to rely on public exhibitions as the only form of CI. It has been observed that these events do not allow for a meaningful input from the public and are only used as a presentation of existing CI input.
- Any CIS must be signed by both the applicant and a representative from the community. This ensures that the community is not kept in the dark or misrepresented.
- The city's SCI is reviewed annually and has been updated to include more guidance and encouragement for pre-app CI.

Weaknesses

- The system of contacting groups at pre-app stage is done through a volunteer coordinating body rather than by the relevant planning case officer of the LPA.

Links

SCI:
http://www.bristol.gov.uk/page/planning-statement-community-involvement
CI Guidelines:
http://www.bristol.gov.uk/sites/default/files/documents/planning_and_building_regulations/planning_applications_and_process/Guidelines%20for%20pre-application%20involvement%20-%20April%202011.pdf
Neighbourhood Planning Network:
http://www.bristolnpn.net/

BRISTOL

Case Study 1

The White Horse, Bedminster: Conversion of existing pub to residential and commercial use and construction of new adjoining residential units.

>>> As a result of the established process in Bristol, even a small proposal can benefit from thorough pre-application CI. With the help of the NPN and BCC, 2 community groups were contacted very early on and the guidelines set out in the SCI were followed. The consultation had a very visible influence of the final designs.

- CIS submitted, and signed by the developer and 2 different community groups.
- Early consultation was enabled through the NPN - community groups were involved in the laying out of the brief, then in the ongoing designs.
- Repeat meetings were carried out with the same interested parties as the plans progressed - this allowed community groups to see the effects of the consultation on the designs, then continue to influence the final proposals.
- Scheme architect and planning consultants present at each consultation event.
- Both community groups involved were concerned about the loss of the pub as a community facility. The plans were adapted to include space for a café/bar on the ground level of the existing pub.
- The street frontage of the development was altered to include a softer, green border as a result of consultation events.
- Further aesthetic and programmatic issues agreed upon.

BRISTOL

Case Study 2

Bristol Entertainment Centre, Frogmore Street: Partial demolition of the former Bristol Entertainment Centre with redevelopment above to provide 442 student bedrooms, extension at the ground floor to accommodate a café, change of use of the existing car park to leisure use.

>>> Example of early pre-app CI, and the effective use of a consultant to conduct the consultation process. This project also shows that, for sensitive projects, it is beneficial to include many different stakeholders in the CI process (community groups, concerned neighbours, council members and other design professionals). This means that fewer objections can be made at the application stage and the developer has more chance of a successful application. The final solution may not be ideal for everybody, but can be a suitable compromise.

North East Elevation
1 : 200

North West Elevation
1 : 200
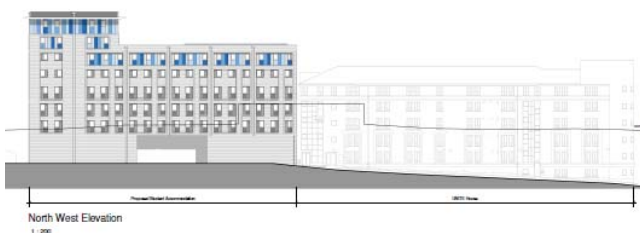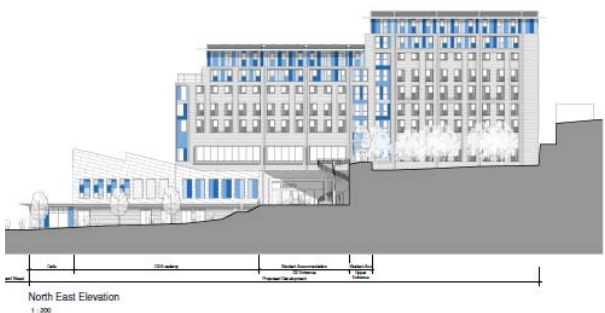
- After initial discussions with the NPN, Christmas Steps Arts Quarter (CSAQ) and Bristol Civic Society, it was decided that CSAQ would take the lead on initial consultation.
- 4 consultation events took place, managed by a consultation company, between October 2011 and May 2012. These repeat events with the same interested party allowed points made at each meeting to be incorporated into the designs and then re-evaluated.
- Similar repeat events were held with the Bristol Urban Design Forum (BUDF) and Bristol City Council.
- Other affected parties included in the consultation were the existing lease holders of the building, local councillors, immediate neighbours and users of the ice rink which is to be demolished.
- After the first round of consultation, extensive radio coverage and mailings to 380 local addresses invited people to a public exhibition at which plans were made public and input invited.
- The public were involved, via the consultation process, to influence the S106 provision. The money was allocated to the improvement of the Trenchard St. street scape.
- The main objection to the scheme by the public was from users of the ice rink concerned that the loss of the facility would be detrimental to themselves and the city.
- The developer has eventually agreed to potentially hold back on the development until assurances are made that a temporary rink can be provided.
- Following the consultation with BUDF and local residents, the massing of the scheme was altered to avoid interfering with views and to create a less dominating present on the street.
- Other changes to the proposal included use, aesthetics, materiality, and massing.

LEEDS

Overview

- The principles of LCC's community involvement strategy set out in its SCI include:
    - Early contact: involvement of stakeholders at earliest point
    - Accessibility: planning documents available to all
    - Appropriate consultation methods (guidance given)
    - Aim to reduce barriers: to involve as much of the community as possible
    - Feedback: summarised feedback given to consultation participants
- The Leeds demographic includes a large percentage of typically 'hard to reach' groups – ethnic minorities, low literacy rates etc. This provides for a harder consultation process.
- Leeds' stance on CI puts most of the responsibility on applicants to conduct consultations, with guidance given by the planning authority.

Strengths

- A CIS is required as a validation document for both major applications (as defined in Town & Country Planning Order 1995) and for proposals which are 'of community significance' - defined by LCC as an application that may give rise to local controversy.
- Pre application talks with the planning authority aim to establish whether there is a need for CI or not.
- LCC have an extensive list of existing community groups which can be used in a consultation process.
- Good online process for commenting on planning applications after submission and receiving feedback.

Weaknesses

- There is no protocol to assist in establishing contact between applicants and community networks at an early stage.
- CIS can be produced solely by the applicant or developer,.
- Placing all the responsibility on the applicant or developer to conduct pre-app CI without providing assistance or facilitating contact can often lead to insubstantial results.

Links

SCI:
https://consult.leeds.gov.uk/leeds/UploadedFiles/SCI.pdf

LEEDS

Case Study 1

Calls Wharf - Demolition of existing building and erection of 77 new apartments.

>>> Example of how a lack of contact with existing community groups can lead to an unsatisfactory consultation process. The lack of a strong set of guidelines or a protocol to initiate CI in Leeds can allow developers to conduct the minimum level of pre-app CI needed to appear to have consulted the community. A public exhibition, after the plans have already progressed, can leave participants feeling that they have little influence on the proposals. No meaningful meetings were held with the public during the design stage.

- CIS Submitted.
- Consultation took place after pre-app discussions, but also after plans were significantly progressed.
- Consultation carried out by planning consultants.
- Only action taken was to send out written invitations to a public exhibition for immediate residents.
- 7 people attended with only one response.
- No changes were made to the proposals as a result of the consultation.

Case Studies 2 and 3

>>> While a CIS is required for major applications in Leeds, it appears that a large number of major applications are submitted without any evidence of CI. The following examples are chosen to highlight this.

- Brown Lane, East Holbeck, Leeds - 23 new houses and one block of 18 flats. (Pending at time of writing)

- No CIS submitted - only statements received via public access after submission of planning application.

- Demolition of vacant school building and café to erect 48 units of accommodation. (Pending at time of writing)

-No CIS submitted.

MANCHESTER

Overview

- MCC placed a lot of emphasis on involving the community while producing their Local Development Documents. The provisions for encouraging consultation in planning applications are less thorough.
- A CIS is not a required document for major applications, and is only strongly recommended for proposals involving more than 150 dwellings.
- Developers have little obligation or encouragement to conduct consultation.
- No clear set of guidelines are provided by the planning authority.

Strengths

- There are a number of organisations connected to the City Council that can act as facilitators in a consultation process - notably New East Manchester, and the various Council Regeneration Teams.
- Very good online planning system to search and comment on submitted planning applications.

Weaknesses

- CIS is not a validation document for applications of any size.
- No process is established to introduce applicants to existing community groups at an early stage.
- S106 decisions made by a panel including the developer, planning officers and local councillors – often with no direct input from communities.
- Council funded organisations that facilitate in pre-app CI run the risk of losing funding.
- No clear set of guidelines are provided by the planning authority, other than a brief list of consultation exercises listed in the SCI.
- CIS can be produced solely by the applicant or developer.

Links

SCI:
http://www.manchester.gov.uk/info/500002/council_policies_and_strategies/1966/statement_of_community_involvement

MANCHESTER

Case Study 1

Newton Heath - 400 new res. units, 6,650 m2 retail floor space.

>>> Example of how the involvement of existing organisations within the city at an early stage can improve the quality and scope of CI and improve the planning application.

- CIS Submitted.
- Consultation was carried out by a property consultant on behalf of the developer.
- New East Manchester (a council owned regeneration company) took on a facilitating role.
- Thorough consultation carried out with numerous meetings and events.
- Time-scale quite short (1 month), with no repeat meetings with the same members of community after plans developed.
- Very good feedback produced.

Case Study 2

Louisa St. Bradford, Manchester - 24 2 storey terrace houses with associated landscaping and parking.

>>> No CI undertaken. Because there is no requirement to submit a CIS as part of an application, and especially as the proposal does not fall under what MCC defines as a major application, this fairly large scheme was approved with no community consultation.

NOTTINGHAM

Overview

- Nottingham has a positive stance on pre-application community involvement, encouraging engagement at an early stage, and requiring applicants to document any CI as part of the submitted design and access statement.
- The policy for initiating a pre-app CI process is to contact the relevant Area Committee, of which there are 9 in the city. Committees are made up of local councillors and elected community representatives, and may be able to facilitate contact between developers and local community groups.
- The consultation methods to be used are decided on during discussions between Area Committee chairs and neighbourhood managers.
- Council employed neighbourhood managers and neighbourhood development teams assist in the consultation process throughout.

Strengths

- CIS is required for major or sensitive developments.
- There is an established process to encourage and facilitate pre-app CI. Instead of leaving the applicant to make contact with the community, existing networks within the city are utilised.
- Guidelines and active help from the planning authority assist the developer throughout the process.
- Neighbourhood managers are involved in the CI processes throughout - assisting applicants to achieve a meaningful consultation.

Weaknesses

- Placing too much responsibility on Area Committees could result in an smaller section of the demographic being consulted, and the exclusion of hard to reach groups.
- If the Area Committees do not have specific training in CI and planning they may be a hindrance to the CI process.
- The online system for planning applications is difficult to navigate, with limited search options. A planning reference number or postcode is needed to find and comment on a submitted application.

Links

SCI:
http://www.nottinghamcity.gov.uk/CHttpHandler.ashx?id=812&p=0
Sustainable Community Strategy 2020:
http://www.onenottingham.org.uk/CHttpHandler.ashx?id=10663&p=0
Neighbourhood Regeneration Teams:
http://www.nottinghamcity.gov.uk/index.aspx?articleid=3836

NOTTINGHAM

Case Study 1

Stonebridge Park: 25ha housing development - demolition of much of the existing estate, construction of 400 new dwellings, and the renovation of remaining houses and infrastructure.

>>> Example of the importance of pre-app CI for very large schemes. The insistence on extensive consultation by the planning authority resulted in a very concerted and thorough effort by the developer, which was guided throughout by the neighbourhood manager.

Early visuals used for discussion with residents, explaining the proposal to change existing houses to address the street in a more traditional way (rather than turning their backs on it)

- Full account of consultation documented in submitted design and access statement.
- Consultation initiated through local Area Committee and facilitated by one of the council's neighbourhood managers and neighbourhood development team.
- Community groups identified early on by the Area Committee and neighbourhood manager.
- Consultation process lasted over 3 years, with continuous contact with regular participants.
- Various consultation methods used – including meetings, exhibitions and workshops.
- Clear results of consultation presented, including its influence on the proposals. Before and after diagrams and descriptions of changes in the scheme as a result of CI.

BIRMINGHAM

Overview

- The Birmingham planning authority has set out core principles for community involvement in planning applications:
    - a) Consult early.
    - b) Use appropriate consultation methods.
    - c) Use plain English.
    - d) Be prepared to experiment with a wide range of innovative consultation methods.
    - e) Ensure that everyone is included.
- However, in practice there seems to be little commitment to CI, with no standard procedure at pre-application stage to initiate consultation other than informal talks with planning officers.
- There seems to be little input or help from the planning authority in carrying out CI, with more responsibility lying on the developer and, to some degree, voluntary community groups.
- There is a history of strong community identity in certain parts of Birmingham, which is reflected by the large number of established neighbourhood forums and community groups. While not specifically designated for planning issues, these established community resources have the potential to improve the quality of CI for planning applications in the city.

Strengths

- Effective online system for leaving comments on submitted planning applications and viewing all related documents.
- Planning committee meetings can be watched online as a webcast.
- Large number of established neighbourhood forums and an online community network run in part by the council and an independent voluntary group, that potentially could be contacted to be involved in CI for relevant proposals.

Weaknesses

- Lack of an established process for initiating and carrying out CI.
- Although a required validation document, a CIS is rarely submitted with major applications other than for very large scale developments.
- Authority does not seem to assist in facilitating contact between the applicant and local community, or offer help and advice while consultation is under way.
- CIS, where included, is produced solely by the applicant or developer.

Links

SCI:
http://www.birmingham.gov.uk/sci
The Neighbourhood, Community Network:
http://theneighbourhood.info/
Webcasts:
http://www.birmingham.public-i.tv/core/portal/webcasts

BIRMINGHAM

Case Study 1

Former MG Rovers works, Longbridge: Mixed use development comprising new superstore, shops, restaurants/cafés, public houses, offices, 40 residential apartments, hotel and new public park.

>>> Consultation was carried out too late in the design process for it to have a meaningful impact on the proposals. It is unclear in what way the consultation influenced the designs, if at all. No contact with existing community groups was made, possibly due to the lack of an existing process to initiate pre-app CI in Birmingham. The one exhibition event was unsatisfactory as no repeat meetings were held and public comments were not responded to. The generic question - 'do you agree with the proposals?' - used in the questionnaire, does not allow for a range of answers and does not assist the public in thinking about particular issues they may have with the development.

- Consultation was carried out on the second application for the site. After the first application in 2008 it was thought necessary to alter the proposals to suit the changed economic landscape.
- Engagement was carried out after the plans were fully progressed.
- Invitations to a public exhibition were circulated by post to 25,000 addresses, and through the Longbridge website and a press release in the Birmingham Mail.
- The exhibition lasted 6 hours and was well attended by over 600 people.
- This was the only public consultation carried out.
- Plans were presented and comments invited. A short form was completed by participants asking for general comments on the proposals which included a tickbox section asking to what degree participants agreed with the proposals.
- 60% of participants supported the proposals.
- Issues raised included traffic, car parking, public transport, maintenance and security.
- No evidence of how the plans were altered in response to the CI was included in either the CIS or the Design and Access Statement.

SHEFFIELD

Overview

• Sheffield has a number of positive policies with relation to community involvement in planning.
• The updated SCI takes a strong stance on encouraging and assisting applicants to conduct pre-app CI.
• However, there seems to be little evidence of effective pre-app CI for many large planning applications.

Strengths

• A Code of Practice for community involvement is available to applicants and members of the general public from the council website. This document can be used as a guide during pre-app CI.
• During pre-application discussions with the planning authority, the size and impact of the proposals will be assessed using Sheffield's Added Value Test. This will allow the applicant to assess the amount and type of consultation needed early on.
• Once pre-app CI has been decided on, the applicant and the planning service agree a course of action.
• The case officer corresponds with the relevant Community Assembly (there are 7 in Sheffield - acting as democratic public forums, not just for planning).
• Applicant must produce a Consultation Supporting Statement (CSS), highlighting what consultation was done and how it affected the designs.
• The planning authority have criteria for testing the validity of pre-app CI:
    - Was the approach agreed with planning service?
    - Was it transparent and inclusive?
    - Have all sound objections to the proposals been addressed?
    - Has a CSS document been submitted?

Weaknesses

- There seems to be very little evidence for effective pre-app CI in Sheffield. While the process looks positive on paper, it may not be enforced in actuality.
- There may be too much reliance on the Community Assemblies to assist in the consultation.
- It is unclear what the parameters of the Added Value Test are, but it seems that usually only very large proposals are required to conduct pre-app CI.

Links

SCI and Code of Best Practice:
https://www.sheffield.gov.uk/planning-and-city-development/planningdocuments/local-plan/statement-of-community-involvement.html

SHEFFIELD

Case Study 1

Crookes Road, Sheffield: Taylor Wipmey estate, Demolition of Halls of Residence, Annexe building and Nos. 30 and 38 Taptonville Road, the erection of 94 residential units in two, three and four storey buildings and conversion of Hadow House and Coach House to form 10 apartments with associated car parking and landscaping.

>>> Example of a developer carrying out pre-app CI with little intention of using it for its intended purpose. The proposals were already finalised when the CI was undertaken. The CI was insubstantial, and the community's views ignored.

- Community Supporting Statement (CSS) submitted, created by a consultant.
- The CSS mentions the importance of pre-app CI.
- The only pre-app CI undertaken was a comment sheet sent to 120 local residents.
- Comments were only invited after the plans were fully developed.
- Many concerns were raised via the comment sheets including: the need to retain an existing arboretum and walled 'secret garden' on the site, the lack of any through roads isolating the development from the existing community, parking, security and noise issues.
- Several comments mention the lack of real pre-app CI - accusing the developer of conducting a tick-box exercise. Some people suggest a public meeting, or a meeting between the developer and a number of community representatives.
- No aspect of the proposals was altered in response to public comments. Instead, the CSS responds to each issue raised with a defence of the original plans.
- In response to the request for a more meaningful consultation process the developer states:

  'There is a commercial deadline to bringing forward development on the site and there has been a substantial amount of previous consultation in respect of the principle of development and as such a public meeting for local residents to voice any concerns was not considered beneficial as it would likely raise issues which have previously been agreed or established as not being harmful.'

NEWCASTLE

Overview

- The SCI produced by Newcastle Council in 2006 was relatively thorough, and had a number of positive features which were unique to the city. However, in the revised 2013 version, the advice and guidelines provided by the planning authority are minimal, and it seems that there is now much less time and fewer resources given to CI in the planning process.
- Rather than focussing on pre-app CI, all the effort from the planning authority now focuses on public consultation after an application is submitted. The only pre-app action recommended to applicants is to engage in talks with the planning authority itself.
- A CIS is only required for some major developments - as decided by the planning authority at pre-app talks - and even then this just has to show that applicants have conformed to the rules set out in the SCI, which are now very minimal.

Strengths

- In the 2006 SCI, a CI scoping report was required to be produced by applicants before pre-app CI could take place. This was a useful tool to guide applicants through the process, and included headings such as: How proposed CI will influence decision making, How community will be involved, Proposed actions with timetable. This is no longer in the 2013 SCI.
- Effective online system for reviewing applications and making comments.
- The planning authority provide assistance in some cases to applicants who conduct CI.

Weaknesses

- No process to initiate CI process at an early stage.
- No guidelines or advice to applicants on how to conduct effective CI.
- SCI review has replaced a much more thorough document with a basic one that has very little guidance on pre-app CI.

Links

SCI 2006:
http://www.newcastle.gov.uk/planning-and-buildings/planning/statement-community-involvement
SCI 2013:
http://www.newcastle.gov.uk/planning-and-buildings/planning/planning-policy-guidance

NEWCASTLE

Case Study 1

Hanover Square: Residential development.

>>> As there is no set level at which the size of a development requires pre-app CI, many projects in Newcastle are progressed without community consultation. No CI was undertaken for this residential development of a 6 story block consisting of 25 flats.

Case Study 2

Former Tyne Tees Television Site: Student accommodation - 6 storey block of 30 flats plus hotel. Permission refused.

>>> Because the community were only involved at a late stage in the design process of this application, many people were instantly opposed to the proposals. If, instead of being invited to an exhibition of the fully developed plan, the community had been involved in meetings earlier in the design stage, there may have been less resistance and more chance of the application being accepted.

- CIS submitted.
- Public exhibition held after plans were produced.
- Council assisted developer by gauging how many invitations should be sent out, and in securing a community centre for the exhibition.
- The majority of comments received at the event were negative.
- Most of the issues raised (traffic, nose, security) were deemed by the developer to be council matters and not responded to.
- The possibility of introducing a shop to the scheme was a response to comments that there is a lack of shops in the area.

LIVERPOOL

Overview

- Community involvement is not standard for all major applications in Liverpool. Developers are only encouraged to conduct pre-app CI if the proposals include more than 150 residential units, 10,000m2 commercial floor space or if there is an impact on the city skyline.
- In these cases the procedure is to put developers in early contact with the relevant ward councillors, who may assist in the CI process.
- The Liverpool Community Network was used to assist in CI for applications, but it was shut down due to budget cuts several years ago.

Strengths

- Some effort is made to initiate pre-app CI by putting developers in touch with relevant ward councillors.

Weaknesses

- CI only recommended for very large developments.
- A lot of the responsibility for conducting CI rests with the developer, with little assistance provided by the planning authority.
- No CIS must be submitted for any development, but is recommended in some cases. If any CI is carried out, evidence of it should be shown in the supplementary Design and Access Statement.

Case Studies

- It was not possible to find examples of any CI for planning applications using the online planning search criteria. It may be that the information is withheld for privacy reasons, but there are certainly a large number of major developments where no CI has been conducted.

Links

SCI:
http://liverpool.gov.uk/media/104441/statementofcommunityinvolvement.pdf
Neighbourhood Committees:
http://liverpool.gov.uk/council/councillors-and-committees/
Liverpool Community Engagement Toolkit:
http://www.liverpool.nsw.gov.au/council/community-consultation/community-engagement-tool-kit

KEY FINDINGS

It is clear, by comparing CI practice in England's core cities, that the quality and amount of pre-application community involvement varies greatly between them. For example, in Manchester and Liverpool, where there are a very large number of planning applications submitted each year, it is only policy to encourage pre-app CI for very large developments, ie. more than 150 dwellings, compared to 10 in Bristol or Nottingham. Even then, there is less incentive for applicants to consult. This disparity is considerable, meaning that many large scale developments are built in some cities with no input from the local community, other than comments made after the proposals are finished.

It is also noticeable that, where some cities have improved their policies on pre-app CI since the 2004 planning act, others have reduced their scope and impact. Bristol and Sheffield have both revised their SCI to make it more effective – and produced further guidelines or codes of practice to assist applicants in pre-application consultation. On the other hand, Newcastle Council has reduced its SCI in the last year to make it a lot less binding, and removed some elements that were intended to guide applicants through the process.

Listed below are some of the key features from the cities studied that seem to lead to better consultation results.

1. Codes of Practice
Sheffield, Bristol, Nottingham

Seveal authorities provide a set of guidelines that can be given to applicants during pre-application talks. These outline what needs to be achieved during pre-app CI and give advice on how to go about it. For example:
* Agree an agenda and timetable for CI with amenity groups and council.
* Present early sketches to community groups and then arrange repeat meetings with the same parties as plans progress.
* Organise public workshops or exhibitions if necessary.

The guidelines developed for Bristol Council are particularly useful, as they are presented in a linear time scale – as an itinerary of actions that applicants and the planning authority can do to ensure meaningful pre-app CI. National guidelines on community engagement are available through organisations such as Planning Aid. [1]

2. CIS for all major applications
Nottingham, Bristol

The official definition of a major application is 10 or more dwellings, or over 1,000m^2 floor space. This is the level set in Bristol and Nottingham for the requirement to submit a CIS with the application. In these cities there are fewer large applications being passed without any input from the community.

---

[1] See: Good Practice Guide to Public Engagement in Development Schemes, A toolkit/guide by Planning Aid. Link: http://www.homesandcommunities.co.uk/good-practice-guide-public-engagement-development-schemes

KEY FINDINGS

3. Protocol for initiating early CI
Bristol, Nottingham

An established process for setting up pre-app CI can ensure that developers receive the help and encouragement needed to conduct thorough consultations. Rather than taking each case as it comes, or leaving it up to each developer, in Bristol and Nottingham it is standard procedure to refer all major applications to an independent party that helps to initiate pre-app CI. Existing community groups and other affected parties are contacted as soon as an application is registered, and a dialogue between them and the developer is created. The CI process can then continue as the designs progress.

4. Bristol Neighbourhood Planning Network

The NPN helps to set up community planning amenity groups where there are none, facilitate contact between developers and communities, and help to set the guidelines on how CI should be conducted in the city.

Through its relationship with Bristol Council, the NPN has influenced the way the planning authority encourages and assesses pre-app CI. For example, the NPN has included a number of questions to be included in the officer's report for submitted applications, which assess any CI process undertaken. This in turn gives added incentive to developers to conduct thorough pre-app CI.

The NPN in Bristol has had a large impact on the way CI is enabled in the city. By comparing Bristol to other large cities, we can see that, without an organisation making communities aware that they can be involved in planning decisions in their area, there is often a lack of public interest and involvement in pre-app CI.

5. Jointly signed CIS
Bristol

By ensuring that the CIS is signed by both the developer and the participating community groups, it becomes clear that the community are happy that they have had their say and been listened to. This leads to fewer delays for the applicant later in the application process.

KEY FINDINGS

6. Community Involvement Scoping Exercise
Newcastle

While the community involvement scoping exercise is no longer required in Newcastle, it was a useful way to encourage applicants to set down a strong agenda for pre-app CI. During pre-application talks, the applicant was asked to make clear who they would engage with, how they would go about it and how the community's ideas would influence decision making. They would then have to outline all actions and events to be organised and show a timetable of the proposed CI exercise.

7. Specialist public consultation companies

It has been shown that using an independent third party with experience in running public consultations can be a very useful way of increasing the effectiveness of pre-app CI. If developers are willing to use such a company, it can be beneficial to both themselves and the community involved. CI will usually be more thorough and impartial. It has been shown in this report that developers carrying out their own CI will often simply invite immediate neighbours to an exhibition or ask them to complete a simple questionnaire. Those involved should not be traditional PR companies tasked solely with delivering permission for the applicant. For an example of the effective use of a public consultation company see Bristol case study 2.

8. Using existing community networks
Birmingham, Nottingham, Sheffield, Bristol

There are a number of examples in this report of pre-app CI where the developer fails to make use of existing community groups and ends up with an under-attended consultation event. It can be seen to be more effective to utilise existing networks, at least as a starting point, to reach out to local communities early on. This needs to be part of a standard procedure for the planning authority - the Area Committees in Nottingham for example are contacted after pre-application talks, or the Community Assemblies in Sheffield, or the NPN in Bristol.

9. Criteria to test the validity of pre-app CI
Sheffield

Once an application has been submitted and evidence of any consultation is provided, the authority needs to be able to assess to what degree the CI was successful. In Sheffield's validity test, CI is assessed by asking:
* Was the approach agreed with the planning service?
* Was it transparent and inclusive?
* Have all sound objections to the proposals been addressed?
* Has a CSS document been submitted?

This validity test is made available to applicants before they begin pre-app CI, so that they are able to work towards it, reducing the risk of an unsuccessful application.