

## **Draft Revised Statement of Community Involvement 2015 Statement of Consultation**

### **1. Consultation**

1.1 The draft SCI was subject to a period of eight weeks public consultation 20th November 2014 to 16<sup>th</sup> January 2015.

1.2 A specific page was created on the Council website (<http://www.brighton-hove.gov.uk/content/planning/local-development-framework/statement-community-involvement> ) which provided a link to the Draft Revised SCI and Comments Form and Consultation Portal.

1.3 The Council's planning consultation database includes all the relevant statutory consultees and other non-statutory consultees. Non-statutory consultees include key stakeholders across the Council and key external partners. These organisations or individuals were sent an email notifying them of the SCI consultation and invited them to make comments. This email provided a link to the Council's SCI webpage. A letter was sent to all those consultees who did not have an email address. A copy of the letter and email can be viewed in Appendix A.

1.4 The SCI and Comments Form were also made available at the Council's Customer Service Centres and all libraries across the City.

1.5 A Press Release was issue by the council on its website advertising the consultation period.

### **2. Consultation Responses**

2.1 Eight representations were received during this time period of which three stated that they had no specific comments to make. Five representations were therefore considered in finalising the SCI for adoption. The representations can be viewed at Appendix B. A summary of representations and an officer response can be seen in Appendix C.

## Appendix A - Consultation Material

### i) Comments Form



**Consultation Form**  
**Draft Revised Statement of Community Involvement (SCI)**  
**20<sup>th</sup> November 2014 until 16 January 2015**

1. Name
2. Organisation Name (if applicable)
3. Email Address
4. Postal Address

5. Please provide comments on the Revised Draft Statement of Community Involvement 2014 below and indicate the page number and section you are referring to. Please keep your comments concise.

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All representations must be received at the email or postal address given on this form by midnight on Tuesday 16<sup>th</sup> January 2015.

Completed forms should be sent to:

Email: [ldf@brighton-hove.gov.uk](mailto:ldf@brighton-hove.gov.uk)

Post: LDF Team, Brighton & Hove City Council, Room 201, Kings House, Grand Avenue, Hove, BN3 2LS

If you have any further queries please contact us on 01273 292505 or via email [ldf@brighton-hove.gov.uk](mailto:ldf@brighton-hove.gov.uk)

Thank you for taking the time to complete your comments.

## ii) Press Release

The screenshot shows a web browser displaying a press release on the Brighton & Hove City Council website. The URL is [www.brighton-hove.gov.uk/content/press-release/have-your-say-how-council-consults-planning-0](http://www.brighton-hove.gov.uk/content/press-release/have-your-say-how-council-consults-planning-0). The page features a navigation menu on the left with options like 'Search news', 'In the news', 'Press office', 'Filming in the city', 'Cityclean industrial action', 'Royal Pavilion Estate', and 'Contact this service'. The main content area has a breadcrumb trail: 'Home » Council and democracy » News » Search news'. The title of the press release is 'Have your say on how the council consults on planning'. The release date is Friday, 21 November 2014. The text of the press release discusses the council's process for planning consultations, mentions a draft 'Statement of Community Involvement', and includes a quote from Councillor Phélim Mac Cafferty. The closing date for comments is 16 January 2015. At the bottom, it lists ways to submit comments: via email ([ldf@brighton-hove.gov.uk](mailto:ldf@brighton-hove.gov.uk)), through the [council online consultation portal](#), or in writing to the SCI Consultation, Local Development Team, Room 201, Kings House, Grand Avenue, Hove, BN3 2LS.

### iii) Consultation Letter



**Brighton & Hove City Council**

**Have your say on how we consult you**

The Council has updated its adopted Statement of Community Involvement (SCI). This sets out how we consult you on our development plans and planning applications.

We would welcome your views on the revised draft SCI between 20 November 2014 and 16 January 2015.

A copy of the Draft Revised SCI can be found online at [www.brighton-hove.gov.uk/sci](http://www.brighton-hove.gov.uk/sci) and a hardcopy is in Hove and Brighton Customer Service Centres as well as all local libraries.

Comments can be made online: via the Council Consultation Portal: <http://consult.brighton-hove.gov.uk/portal> or by using the Consultation Form on the council's website: [www.brighton-hove.gov.uk/sci](http://www.brighton-hove.gov.uk/sci)

Please send this back to us via:

- Email: [ldf@brighton-hove.gov.uk](mailto:ldf@brighton-hove.gov.uk)
- Post:  
Local Development Team,  
Brighton & Hove City Council,  
Room 201 Kings House,  
Grand Avenue, Hove, BN3 2LS

## iv) Consultation Email

Subject: Have your say on how we consult you...

Dear Consultee,

**Re: Have your say on how we consult you...**

The Council has updated its adopted Statement of Community Involvement (SCI). This sets out how we consult you on our development plans and planning applications.

We would welcome your views on the revised draft SCI from **20 November 2014** ending on midnight **16 January 2015**.

A copy of the Draft Revised SCI can be found online at [www.brighton-hove.gov.uk/sci](http://www.brighton-hove.gov.uk/sci) and a hardcopy is in [Hove](#) and [Brighton](#) Customer Service Centres as well as [all local libraries](#).

Comments can be made online: via the Council Consultation Portal: <http://consult.brighton-hove.gov.uk/portal>

Or by using the Consultation Form on the council's website: [www.brighton-hove.gov.uk/sci](http://www.brighton-hove.gov.uk/sci)

Forms can be sent back to us via:

- Email: [ldf@brighton-hove.gov.uk](mailto:ldf@brighton-hove.gov.uk)
- Post: Local Development Team, Room 201 Kings House, Grand Avenue, Hove, BN3 2LS

Kind Regards

Local Development Team  
Planning & Building Control



## **Appendix B) - Copies of Representations Received**

## Comment

<b>Event Name</b>	Draft Revised Statement of Community Involvement
<b>Comment ID</b>	2
<b>Response Date</b>	21/11/14 10:57
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	0.1

**1. Name** Gill Wales

**3. Email Address**

**4. Address**

**5. Please provide comments on the Revised Draft Statement of Community Involvement 2014 below and indicate the page number and section you are referring to. Please keep your comments concise. Thank you**

It's great that there is a community involvement plan, and it's a well written document, but it feels as though you are really only aiming to engage with people who already make the effort to engage - those who have joined organisations or who take the trouble to check and navigate your website or visit your offices - presumably on the offchance that there might be something important they need to know about. My feeling, as an ordinary Brightonian, is that not enough is done to tell the wider audience of residents about what is planned even within their own neighbourhoods. It's made worse by the lack of an effective local press. I would like to see more effort made to take information to people rather than expect people to look for information. For example, posters (not just typed planning notices) in commonly visited locations within communities (shops, doctors surgeries, post offices - not just lamp posts outside the affected site) to at least tell people that there is a planning application or a proposed scheme and that more information is available. It then needs to be easier to find information on your website. It is frustratingly difficult to find information about specific schemes, because documentation is stored by planning application number. When you eventually find what you're looking for, you are presented with a mass of documents to work through. Navigation needs to be quicker and more direct, leading people to an overview of the proposal that allows people to decide whether they need to know more. I understand the difficulties involved in making these issues accessible to lay people and I applaud the efforts you've made so far, but making information available does not, in itself, make people better informed.

## Comment

<b>Event Name</b>	Draft Revised Statement of Community Involvement
<b>Comment ID</b>	3
<b>Response Date</b>	23/11/14 14:43
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	0.1
<b>1. Name</b>	R.Shepherd
<b>2. Organisation Name (if applicable)</b>	Roedean Residents Association
<b>3. Email Address</b>	
<b>4. Address</b>	

**5. Please provide comments on the Revised Draft Statement of Community Involvement 2014 below and indicate the page number and section you are referring to. Please keep your comments concise. Thank you**

The present system does not work. Only 70 responses to the first City Plan Part 1. How many residents know about the latest amendment presently out for consultation ? The Argus is read by so few now it would be a waste of money. to advertise there and the ads. were so small and difficult to find. More local notices would help. More timely notice eg. I received information on the Brighton Marina Neighbourhood Forum application 6 days for expiry fo the consultation. Much more involvement with residents associations would help but I do not see them on the list. Does the council hold a list of residents associations throughout the city ? Incidentally the Click on a Survey help button took me to a completely different survey hence you have no references to pages.



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**From:** Steve Ankers [steve.ankers@southdownssociety.org.uk]

**Sent:** 24 November 2014 14:50

**To:** LDF

**Subject:** Statement of Community Involvement

I write on behalf of the South Downs Society, the national park society of the South Downs National Park.

Under "Strategic planning: duty to co-operate" we would expect to see specific reference to the statutory duty under section 62 of the Environment Act 1995 to have regard to the designation of the national park. Although the city council is no longer the LPA for that part of the city within the park, it is under this statutory duty to consider in its policy making any potential impact on the national park, both within and outside the city boundary. We note that the SDNPA is later listed as a consultee but the duty goes further. It would be helpful to see clear recognition of this substantial change since the previous SCI.

As a "Voluntary body, some or all of whose activities benefit any part of the local planning authority's area", this Society wishes to be consulted on any forward planning or development management issues with potential impact on the national park.

I would be grateful if you could acknowledge safe arrival of these comments Thanks.

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Steve Ankers  
Policy Officer  
South Downs Society

South Downs Society Registered office: 2 Swan Court, Station Road, Pulborough, RH20 1RL. The Society is a company limited by guarantee, registered no 319437 and is a registered charity no 230329. [www.southdownssociety.org.uk](http://www.southdownssociety.org.uk)

The South Downs Society is an independent charity which relies on member subscriptions and gifts in wills

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**From:** Jacobs, Keith [Keith.Jacobs@highways.gsi.gov.uk]

**Sent:** 27 November 2014 15:45

**To:** LDF

**Subject:** Consultation - Statement of Community Involvement (SCI ) - updated

Thank you for consulting the Highways Agency on your updated draft SCI and can advise you that we do not have any comment to make regarding the your proposals for consultation on your development plans and planning applications.

We shall be pleased to assist in your planning proposals in the future. For your information the Highways Agency's contacts have changed recently so for your area they are now :-

John Henderson – Asset Manager for E. Sussex  
Keith Jacobs - Assistant Asset Manager for Sussex

**Keith Jacobs, Asset Manager**

Highways Agency | Federated House | London Road | Dorking | RH4 1SZ

Web: <http://www.highways.gov.uk>

GTN: 3904 8219

Safe roads, reliable journeys, informed travellers  
Highways Agency, an executive agency of the Department for Transport.

The original of this email was scanned for viruses by the Government Secure Intranet virus scanning service supplied by Vodafone in partnership with Symantec. (CCTM Certificate Number 2009/09/0052.) This email has been certified virus free.

Communications via the GSi may be automatically logged, monitored and/or recorded for legal purposes.

## Comment

<b>Event Name</b>	Draft Revised Statement of Community Involvement
<b>Comment ID</b>	4
<b>Response Date</b>	28/11/14 11:47
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	0.1
<b>1. Name</b>	sclay
<b>2. Organisation Name (if applicable)</b>	TAP
<b>3. Email Address</b>	

**5. Please provide comments on the Revised Draft Statement of Community Involvement 2014 below and indicate the page number and section you are referring to. Please keep your comments concise. Thank you**

There is nothing to say what a consultation with the community should be. I think its important to have a balanced view and where there is a public event there should be opportunities for the disadvantages and problems of the proposals to be put forward as well as the advantages set out by council officers. If this is not done people lose faith in the process and see it as box ticking by the council. The consultation for the redevelopment of the Level was very well done with households getting details of the scheme and a form to fill in on their views. It was clear where they could have influence and where not. People are pleased with the outcome. The consultation for the Better Bus Scheme in Edward St was not well done with residents having only a sketchy idea of what would happen and many now being furious at the months of disruption and noise for no apparent benefit. There needs to be a standard and it should not be down to individual council officers to decide how to consult. There are consultations with groups which the council thinks represent the community but do not. The Tarner Area Partnership frequently meet with no residents present and few people in the neighbourhood are aware that it exists. Nonetheless the council thinks it has consulted with the community if it brings proposals to meetings.

Date: 01 December 2014  
Our ref: 138235  
Your ref: Statement of Community Involvement (SCI)

Respondent 6



Brighton & Hove City Council  
Local Development Team  
Room 201 Kings House  
Grand Avenue  
Hove  
BN3 2LS

Sustainable Development  
Hornbeam House  
Crewe Business Park  
Electra Way  
Crewe  
Cheshire  
CW1 6GJ

**BY EMAIL ONLY**

Dear Sir/Madam

**Consultation on Statement of Community Involvement for Brighton & Hove City Council**

Thank you for your consultation on the above dated 20 November 2014 which was received by Natural England on 20 November 2014.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

We are supportive of the principle of meaningful and early engagement of the general community-by the public, community and other organisations and statutory bodies in local planning matters, both in terms of shaping policy and participating in the process of determining planning applications.

We regret we are unable to comment, in detail, on individual Statements of Community Involvement but information on the planning service we offer, including advice on how to consult us, can be found at: <http://www.naturalengland.org.uk/ourwork/planningdevelopment/default.aspx>.

We now ask that all planning consultations are sent electronically to the central hub for our planning and development advisory service at the following address: [consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk). This system enables us to deliver the most efficient and effective service to our customers.

We really value your feedback to help us improve the service we offer. We have attached a feedback form to this letter and welcome any comments you might have about our service.

Yours faithfully

Miss Carla Jackson  
Sustainable Development Consultation Team



By email: [ldf@brighton-hove.gov.uk](mailto:ldf@brighton-hove.gov.uk)

Our reference: 859

10 December 2014

Dear Sir/Madam,

**Re: Brighton and Hove Statement of Community Involvement**

Thank you for inviting the Marine Management Organisation (MMO) to comment on the above consultation. I can confirm that the MMO has no comments to submit in relation to this consultation.

If you have any questions or need any further information please just let me know. More information on the role of the MMO can be found on our website [www.gov.uk/mmo](http://www.gov.uk/mmo)

Yours sincerely

Angela Gemmill  
Relationship Manager

E [stakeholder@marinemanagement.org.uk](mailto:stakeholder@marinemanagement.org.uk)

## Comment

<b>Event Name</b>	Draft Revised Statement of Community Involvement
<b>Comment ID</b>	5
<b>Response Date</b>	14/01/15 10:57
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	0.1
<b>1. Name</b>	Kathryn Banks
<b>2. Organisation Name (if applicable)</b>	Arun District Council
<b>3. Email Address</b>	ldf@arun.gov.uk

#### 4. Address

Arun Civic Centre, Maltravers Road, Littlehampton, BN17 5LF

#### 5. Please provide comments on the Revised Draft Statement of Community Involvement 2014 below and indicate the page number and section you are referring to. Please keep your comments concise. Thank you

Many thanks for consulting Arun District Council on the Brighton and Hove Draft Revised Statement of Community Involvement. Please find below officers' comments in response to the Brighton and Hove Draft Revised Statement of Community Involvement. Please note, these comments are officer comments only and have not been agreed through Full Council. Arun District Council welcomes references to the Duty to Cooperate in paragraphs 1.5, 1.21-1.25 and 2.16. It does, however, ask the Council to consider whether Arun District Council should be specifically listed under 2.16 i) Duty to Cooperate, in light of the reference in paragraph 1.24 to the Coastal West Sussex partnership and also as both Councils have joint evidence base studies e.g. the Housing Duty to Cooperate Study and the Assessment of Housing Development Needs Study: Sussex Coast HMA. If you would like to discuss the comments made above, please do feel free to contact me or a member of the Planning Policy and Conservation Team to discuss.

Respondent Number	Date Received	Method Received	Respondent Name	Summary of Comments Received	Officer Comment
1	21/11/2014	Consultation Portal	Gill Wales	<ul style="list-style-type: none"> <li>• Feel you are really only aiming to engage with people who already make the effort to engage e.g. those in organisations or those who check website</li> <li>• Not enough done to tell residents about proposals in neighbourhoods.</li> <li>• Made worse by the lack of an effective local press.</li> <li>• More effort should be made to take information to people rather than expect people to look for information e.g. posters in commonly visited locations within communities (shops, doctors surgeries, post offices)</li> <li>• Website needs to be more accessible as difficult to find information about specific schemes, because documentation is stored by planning application number. Navigation needs to be quicker and more direct, leading people to an overview of the proposal that allows people to decide whether they need to know more.</li> <li>• Understand difficulties involved in making these issues accessible to lay people and I applaud the efforts you've made so far, but making information available does not, in itself, make people better informed.</li> </ul>	<ul style="list-style-type: none"> <li>• The council makes an effort to engage as widely as possible with organisations and residents</li> <li>• The council seeks to ensure that a variety of consultation methods are used to engage with residents such as workshops, exhibitions and focus groups etc We always seek to engage with community groups, LATS, neighbourhood newspapers etc Consultation documentation is distributed to local libraries and customer service centres and placed electronically on our website. We email consultees that we hold details for on our database or write to them</li> <li>• Comments on the website are noted. The planning department are seeking to improve the website's accessibility and have recently undertaken a customer survey which has highlighted areas of improvement which are currently being acted upon.</li> <li>• Comments noted</li> </ul>
2	23/11/2014	Consultation Portal	Rosemary Shepherd Roedean Residents	<ul style="list-style-type: none"> <li>• The present system does not work.</li> <li>• Only 70 responses to the first City Plan Part 1. How many residents know about the latest amendment presently out for</li> </ul>	<ul style="list-style-type: none"> <li>• Comments noted</li> <li>• The submission city plan was one of several stages of consultation on the city plan.</li> </ul>

Respondent Number	Date Received	Method Received	Respondent Name	Summary of Comments Received	Officer Comment
			Association	<p>consultation? The Argus is read by so few now it would be a waste of money to advertise there and the ads were so small and difficult to find.</p> <ul style="list-style-type: none"> <li>• More local notices would help.</li> <li>• More timely notice e.g. I received information on the Brighton Marina Neighbourhood Forum application 6 days for expiry of the consultation.</li> <li>• Much more involvement with residents associations would help but I do not see them on the list. Does the council hold a list of residents associations throughout the city ?</li> </ul>	<p>Informal Issues and Options stages aim to reach more people in the community as the first stage of consultation when there is a greater chance to influence the shape of strategies and policies.</p> <ul style="list-style-type: none"> <li>• Statutory requirements for consultation on Neighbourhood Forum's were followed. Site notices (non statutory) were in place at the beginning of the 6 week period of consultation and information was made available on our website.</li> <li>• Reference to the Argus newspaper is noted however it should be recognised that this is not the only form of press in the city and we use the local radio stations and other newspapers as well as our own press releases to publicise information.</li> <li>• We recognise the difficulties in reaching everyone in the city but we always try variety of methods particularly at the issues and option stage to engage all groups including those that are harder to reach. People are less likely to engage with us at the more formal stages of preparation of plans due to government</li> </ul>



Respondent Number	Date Received	Method Received	Respondent Name	Summary of Comments Received	Officer Comment
3	24/11/2014	Email	South Downs Society	<ul style="list-style-type: none"> <li>• Under "Strategic planning: duty to co-operate" we would expect to see specific reference to the statutory duty under section 62 of the Environment Act 1995 to have regard to the designation of the national park.</li> <li>• Although the city council is no longer the LPA for that part of the city within the park, it is under this statutory duty to consider in its policy making any potential impact on the national park, both within and outside the city boundary. We note that the SDNPA is later listed as a consultee but the duty goes further. It would be helpful to see clear recognition of this substantial change since the previous SCI. As a "Voluntary body, some or all of whose activities benefit any part of the local planning authority's area", this Society wishes to be consulted on any forward planning or development</li> </ul>	<p>requirements of consultation.</p> <ul style="list-style-type: none"> <li>• Over one thousand contacts were contacted at the proposed modifications stage of the city plan and this did include residents associations across the city. Civic and amenity groups listed under general consultees includes residents groups</li> <li>• The city council always monitor and evaluate the level of response rates after each period of consultation</li> <li>• The SDNP Authority is a statutory consultee and therefore it is already set out in the SCI that the council has a statutory duty to consult with them.</li> </ul>

Respondent Number	Date Received	Method Received	Respondent Name	Summary of Comments Received	Officer Comment
4	27/11/2014	Email	Highways Agency	management issues with potential impact on the national park. No comment	Noted
5	28/11/2014	Consultation Portal	S Clay TAP	<ul style="list-style-type: none"> <li>There is nothing to say what a consultation with the community should be.</li> <li>Important to have a balanced view and where there is a public event there should be opportunities for the disadvantages and problems of the proposals to be put forward as well as the advantages set out by council officers. If this is not done people lose faith in the process and see it as box ticking by the council.</li> <li>Respondent points out recent consultation events for The Level and Better Bus Schemes to illustrate their view of effective and ineffective consultation.</li> <li>There needs to be a standard and it should not be down to individual council officers to decide how to consult.</li> <li>There are consultations with groups which the council thinks represent the community but do not. E.g. The Tarnier Area Partnership. The council thinks it has consulted with the community if it brings proposals to meetings.</li> </ul>	<ul style="list-style-type: none"> <li>It would be difficult to say exactly what a consultation with the community should be as this would depend on the type and stage of document being consulted upon. It is hoped that the SCI sets out the principles for consultation and that this follows the principles set out in the Council's Community Engagement Framework.</li> <li>The Informal Issues and Options Stage offers the opportunities for informal discussion of advantages and disadvantages of different options in plan making. Para 2.20 of the SCI sets out that we will make significant effort to engage people at the early stages of preparing local plan documents, when there is greatest opportunity to influence the shape of strategies and policies.</li> <li>Comments noted. These consultations were undertaken by other section of the council and not Planning.</li> <li>The Community Engagement</li> </ul>

Respondent Number	Date Received	Method Received	Respondent Name	Summary of Comments Received	Officer Comment
					<p>Framework sets the standard for consultation for the wider city council.</p> <ul style="list-style-type: none"> <li>The council may choose to visit certain meetings of groups and partnerships as part of consultation.</li> </ul>
6	01/12/2014	Email	Natural England	No comment	Noted
7	10/12/2014	Email	Marine Management Organisation (MMO)	No comment	Noted
8	14/01/2015	Consultation Portal	Arun District Council	<ul style="list-style-type: none"> <li>Arun District Council welcomes references to the Duty to Cooperate in paragraphs 1.5, 1.21-1.25 and 2.16.</li> <li>It does, however, ask the Council to consider whether Arun District Council should be specifically listed under 2.16 i) Duty to Cooperate, in light of the reference in paragraph 1.24 to the Coastal West Sussex partnership and also as both Councils have joint evidence base studies e.g. the Housing Duty to Cooperate Study and the Assessment of Housing Development Needs Study: Sussex Coast HMA.</li> </ul>	<ul style="list-style-type: none"> <li>Agree Arun District Council have been added as a consultation body for Duty to Cooperate</li> </ul>

