

# Statement of Community Involvement



## Report of Consultation March 2023

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## **1.0 Purpose**

- 1.1 The document provides details of engagement and consultation undertaken for the Draft Statement of Community Involvement 2022.

## **2.0 Persons/bodies/groups consulted**

- 2.1 Engagement and consultation has been undertaken with statutory bodies, local businesses, citizens, agents and developers, wider interest groups and stakeholders, local councillors, and Nottingham City Council officers. Emails/letters providing details of the consultation were sent to all contacts on the Local Plan database of consultees.

## **3.0 Ways in which consultation was undertaken**

- 3.1 In line with the City Council's [Interim Statement of Community Involvement \(SCI\), 2020](#) consultation was undertaken online only. The document was available to view and download from the City Council's web site alongside an online response form. Emails and letters were sent to interested parties as set out in section 3. The consultation was also advertised on the Engage Nottingham Hub webpage and a press release was sent out and picked up by local media.
- 3.2 Comments on the draft SCI were invited for an 8 week period from 15<sup>th</sup> August until 5pm on 10<sup>th</sup> October 2022.

## **4.0 Representations**

- 4.1 A total of 29 representation comments were received from 15 interested parties. All comments have been considered and a number of changes to the SCI are proposed as a result. The table in Appendix 1 sets out the comments made, and the City Council's response to them, together with any recommended changes to the draft document.
- 4.2 Alongside amendments proposed directly as a result of comments received a number of minor amendments have been made, for example to address typographical errors and for further clarity.

## **5.0 Sustainability Appraisal**

- 5.1 Undertaking a Sustainability Appraisal (SA) is a statutory requirement/ process, which must be undertaken for any new planning document in accordance with the Planning and Compulsory Purchase Act (2004). The purpose of an SA is to assess the economic, social and environmental impacts of projects, strategies or plans, so that the preferred option promotes, rather than inhibits sustainable development. In addition to an SA, European directive 2001/42/EC (commonly referred to as Strategic Environmental Assessment or SEA),

requires that Local Authorities undertake an “environmental assessment” of any plans and programmes they prepare that are likely to have a significant effect upon the environment.

- 5.2 The requirements of the SEA have been incorporated into the SA for the Local Plan Part 2 (2020). An SA was undertaken on the Local Plan Part 2, therefore a separate SA is not required for this document. The process has appraised social, environmental and economic effects. The SA was undertaken from the start of the LAPP process through its various preparation stages. In doing so, it has helped to ensure that the decisions made on policies and allocations have contributed to achieving sustainable development. Furthermore, the SA recommended some changes to ensure that the LAPP is as sustainable as possible. The SA has facilitated the evaluation of alternatives and also considered the cumulative, synergistic and secondary impacts of the LAPP policies and sites.
- 5.3 The SA also demonstrated that the Plan is an appropriate approach when considering reasonable alternatives and, where negative impacts have been found, suggested suitable mitigation measures to try and overcome them. Monitoring arrangements are also proposed to ensure that the impact of the policies can be properly evaluated.
- 5.4 Full details of the SA process, and methodology can be found at [www.nottinghamcity.gov.uk/localplan](http://www.nottinghamcity.gov.uk/localplan).

## Appendix 1: Summary of Comments Received and Officer Responses

Summary of comments	City Council response
<b>Environment Agency</b>	
No specific comments on document provided	N/A
<b>Erewash Borough Council</b>	
<p>Only wish to highlight that, in our view, under 'Duty to cooperate bodies' in Appendix A: Consultation Bodies, it may be appropriate for 'Greater Nottingham Authorities' to be listed as an item. Ultimately although Erewash Borough is not adjoining the Nottingham City area, the relationship between the two is quite rightly a focus of Duty to Cooperate discussions given their shared presence within the Greater Nottingham area. We feel this would add clarity around the matter.</p>	<p>Comments noted. Individual Greater Nottingham Planning Partnership Authorities have been added in Appendix A.</p>
<b>Historic England</b>	
<p>We support the general aims and approach to the draft Statement of Community Involvement.</p> <p>We note the reference to Historic England being consulted on Listed Building applications in accordance with Government guidance and also note that Historic England is listed as a consultation body for a Local Plan in Appendix A of the SCI; as both a duty to Cooperate Body and a Specific Consultation Body. With regards to neighbourhood planning, we would welcome notification of proposed neighbourhood planning areas as well as consultation on draft plans. The regulations state that Historic England should be consulted on draft plans where our interests are affected.</p>	<p>Support and comments noted and document updated.</p>
<b>Natural England</b>	
<p>We are supportive of the principle of meaningful and early engagement of the general community, community 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: <a href="https://www.gov.uk/guidance/local-planning-authorities-get-environmental-advice">https://www.gov.uk/guidance/local-planning-authorities-get-environmental-advice</a> We now ask that all planning consultations are sent electronically to the central hub for our planning and</p>	<p>Support and comments noted</p>

Summary of comments	City Council response
<p>development advisory service at the following address: consultations@naturalengland.org.uk. This system enables us to deliver the most efficient and effective service to our customers.</p>	
<b>Project VIE</b>	
<p>As part of the monitoring process, feedback and adjustment should be more easily incorporated than exclusively by the appeals process. Development of suitable mid-term protocols to facilitate more responsive steering throughout the planning process would not only benefit current council projects, but also ensure that future priorities are able to be quickly introduced into the long-term reform plans as they become apparent.</p> <p>Inclusion of local business groups and partnerships should be restricted to only those companies vetted by outside governing bodies independent of their own organisations. e.g., local BID projects should be required to meet certain standards of either 'charitable purposes' or required to put into place collaborations with outside auditing commissions before being allowed to contribute toward local planning and especially accessing or otherwise influencing any levelling up funds, etc.</p> <p>Due to the long-term nature of planning applications, and especially of the imminent Local Growth efforts which are anticipated to be geared toward 2025 / 2028 and 2030 / 2050 with sensitive targets in continual need of monitoring, upkeep, and redress, ongoing development of transparency practices should be prioritised amongst the management teams (and if not viable, perhaps as a department within the transformational governance teams).</p>	<p>Comment noted</p> <p>Consultations are made in accordance with statutory requirements.</p> <p>Comment noted</p>
<b>Nottinghamshire County Council</b>	
<p>Cannot see any issue which needs to be raised in respect of the proposed SCI</p>	<p>Comments noted</p>
<b>Trowell Parish Council</b>	
<p>Trowell parish Council would like to be made consultation body as the boundary for Bilborough road and Trowell moor is the parish council boundary. The Parish Council are consulted on planning applications by Broxtowe Borough Council and would welcome being consulted on Nottingham city applications.</p>	<p>The SCI denotes statutory consultees in accordance with statutory requirements set out nationally. Trowell Parish Council are included on the INOVEM council database regarding planning matters in Nottingham.</p>

Summary of comments	City Council response
	Consultations on individual planning applications are undertaken in accordance with the details set out in the SCI
<b>Canal &amp; River Trust</b>	
no comments	Comments noted.
<b>The Coal Authority</b>	
I can confirm that the Planning team at the Coal Authority have no specific comments to make on this.	Comments noted.
<b>National Highways</b>	
happy with the contents of the document and have nothing to add	Comments noted.
<b>British Horse Society</b>	
Appreciate being included as a stakeholder in consultations relating to land development to mitigate the impact on and maximise opportunities for equestrian access. The BHS has no further comments at this time	Comments noted.
<b>Lead Local Flood Authority Nottingham City Council</b>	
It would be beneficial for the Lead Local Flood Authority to be mentioned or listed as a statutory consultee in the following sections: 3.43, 3.52 and the Appendix A.	Agreed. For clarity reference to Lead Local Flood Authority within specified paragraphs will be added.
<b>Mansfield District Council</b>	
Thank you for consulting MDC on the SCI. MDC has no specific comments in relation to the SCI. As a general principle under the Duty to Cooperate, it is anticipated that both authorities will continue to work with each other as and when required to fulfil this duty.	Comments noted.
<b>University of Nottingham Students' Union &amp; Nottingham Trent Students' Union</b>	
Currently, the draft Statement of Community Involvement don't include either the student representative bodies or the City Universities as bodies to consult in any area of local planning or development of plans. One of the likely recommendations to be included in the planned Student Living Strategy to make the supply of student housing more responsive to the needs of the market is for both the relevant representative body/ bodies (i.e. students' unions) and the university/ universities to be included in the planning process. The Statement of Community Involvement provides a good opportunity to 'get the ball rolling' and build this consultation into normal planning practice. In	Comment noted

Summary of comments	City Council response
<p>particular, on page 13 under "Neighbour Notification and Site Notices", we think it would be valuable to add "For applications relating to the supply of student housing, the Council will consult with one or both of the relevant universities and, where relevant, one or both of the relevant students' unions." In practical terms, we will probably develop a streamlined process for reaching out to the four organisations easily to respond in a timely manner. Although there are no Neighbourhood Development Plans currently in place in Nottingham, we think it would be valuable to include under the proposed consultation methods (3.39) "Consultation with student representatives at relevant students' unions and/ or consultation events for local student communities."</p> <p>Reflecting some of the ongoing discussions as part of the student living strategy, it may also be useful to include recommendation for student housing providers to 'engage at an early stage' (as with the statutory consultees in 3.43) with either or both universities as appropriate to understand and better meet the needs of the student market.</p> <p>An alternative to adding these specific paragraphs would be to add a new section for Student Housing/ Accommodation, however, this would be a more substantial change to the document and may not fit with the existing flow.</p>	<p>Comment noted.</p> <p>It is not considered that a specific section for student housing /accommodation is necessary for the SCI document</p>
<b>Nottingham Local Access Forum</b>	
<p>The Forum is generally supportive of the SCI but thinks it could be improved by some additions and amendments.</p> <p>Suggest that the introduction should state how the statement aligns with and supports overall council policies.</p> <p>With regard to Planning Policy matters, we are disappointed that Nottingham Local Access Forum is not listed in Appendix 1.</p> <p>Although not included as a Statutory Consultee under the Planning Acts, NLAf does have an advisory role, as set out above. In practical terms the consultation database, referred to</p>	<p>Comment noted</p> <p>Additional paragraph has been added to the quick guide section setting out the function of the SCI</p> <p>Comment noted</p>



Summary of comments	City Council response
<p>in para. 2.3, does keep us informed on consultation opportunities and is important in ensuring we are formally notified of the progress of planning policy documents.</p> <p>We note that Active Travel England will act as a statutory consultee in the planning system and review active travel provision in major planning applications, as announced in a written statement to parliament on 21 July 2022 on its Framework Document. This should be reflected in the SCI. (Appendix 1 and para 3.52)</p> <p>The Forum thinks that for completeness there should be a section on Informal Planning Policy Guidance. This could be guided by the process adopted in producing the recent 'The Reduction of Carbon in New Development' Guidance.</p> <p>In the section on Neighbourhood Development Plans it should be made clear that there are currently no such plans in Nottingham.</p> <p>With regard to planning applications the Forum feels strongly there should be a sub-section on "Discharge of Planning Conditions". These can relate to significant issues critical to producing good development and be material in improving public rights of way and access to and through Nottingham. We suggest the addition of something along the following lines " Where applications to discharge planning conditions deal with substantive matters of interest to bodies commenting on the original application, the Council may consult with relevant bodies before deciding whether to discharge such conditions."</p> <p>The Forum welcomes the undertaking that, for applications dealt with by planning officers, the Council will produce a report that will be published online. (para 4.2). This is important to maintain transparency and confidence in the planning system and we hope it can be implemented. We note that such reports are included on the planning portal of some other authorities (e.g Sheffield City Council). Despite both the SCIs of November</p>	<p>Active Travel are now named within Appendix 1</p> <p>Comments noted</p> <p>It is not considered necessary to add this information which may become redundant during the use of the document should such plans be created.</p> <p>The discharge of planning conditions is a detailed matter considered to be beyond the scope of this general summary document on scope of consultation.</p> <p>Comments noted.</p>

<b>Summary of comments</b>	<b>City Council response</b>
<p>2019 and June 2020 containing a similar a statement (para 6.2.1) we are not aware that this has been followed through.</p> <p>With regard to applications determined by Planning Committee (para.4.3) it is disappointing that there is no right of speech given to public objectors or supporters of the individual applications being considered. Many council's give their citizens such rights and no justification is given as to why these should be denied in Nottingham.</p> <p>On detailed matters, the link to the Engage Hub in paras. 3.14 and 8.4 does not work. The Government website referred to in paragraph 3.53 no longer has a table 3.</p>	<p>Comments noted.</p> <p>Comments noted.</p> <p>Hyperlink amended to accurate address.</p>