

Rochford District SCI

QUESTIONNAIRE QUESTION		AVERAGE MEAN)* 1 = Strongly disagree 10 = Strongly agree N/A	AVERAGE (MODE)** 1 = Strongly disagree 10 = Strongly agree N/A
N/A –General comments			
RESPONDENT	COMMENTS		
Home Builders Federation (HBF)	<p><u>General:</u></p> <p>The Council will have seen the draft document from the Planning Inspectorate entitled ‘A framework for assessing soundness and focussing representations on Statements of Community Involvement’. It will no doubt now need to satisfy itself that it is in full compliance with the content of this document, and also ‘Creating Local Development Frameworks – A Companion Guide to PPS12’. The Statement of Community Involvement also needs to be in accordance with ‘Community Involvement in Planning: The Government’s Objectives’ (ODPM, 2004), and the Town and Country Planning (Local Development) (England) Regulations 2004.</p> <p><u>SPECIFIC MATTERS:</u></p> <p>In relation to the specific content of the Draft document itself; the HBF would like to make the following brief observations:</p> <p><u>Table 1 - Supplementary Planning Documents (SPD’s)</u></p> <p>Reference is made to the intention to produce a series of Supplementary Planning Documents (SPD’s).</p> <p>The HBF understands that such an approach will not be permissible under the new planning act if the proposed SPD’s are introducing matters of new policy (rather than implementation detail), or if they will be setting out revised guidelines and standards from those contained within an Adopted statutory document.</p> <p>Any matters of importance to development costs will instead need to be clearly set out in a Development Plan Document (DPD), rather than being delegated down to a SPD. Given that they could potentially have a significant impact on development viability, they must instead be dealt with in DPD’s and subject to the appropriate public scrutiny bestowed upon these.</p>		

5. Public Engagement Techniques

The HBF would find it most useful if the Council communicates by letters and/or e-mails with regard to the production of either draft or adopted DPD and SPD documents. Such an approach would seemingly benefit all those that have commercial or site interests in the district, but are not physically based within it. Whilst clear and detailed information on the Council's website will be welcomed, it will be of little benefit unless it is specifically drawn to the attention of all interested parties (e.g. by letters and/or e-mails).

Hopefully landowners, planning agents and developers (including locally active house builders) will be directly consulted in relation to all new documents of relevance to them. The Federation believes that the development industry has an important role to play in the planning process, particularly with regard to all matters related to the actual implementation of policies and proposals. The Federation hopes that the Council will seek to consult directly with local house builders and other interested parties, rather than rely on other organisations passing the information down to their memberships.

In relation to the Council's database of interested parties to be maintained throughout the LDF process, the HBF would like its details included on it, in order that it can be properly involved throughout the planning process.

The HBF would point out that Regulations 17 and 24 of the Town and Country Planning (Local Development) (England) Regulations 2004 also require copies of the SPD / DPD and their Sustainability Appraisals be sent to specific consultation bodies to the extent that the local planning authority thinks that the SPD / DPD affects the body.

Therefore, the Council must ensure that copies of the aforementioned documents will be sent to all relevant key non-statutory consultees. I would point out that the HBF (Home Builders Federation) is listed as a key consultee in Annex E of PPS12.

Page 15 & Table 4

The text refers in the 2nd paragraph to '*..a range number of techniques that a developer should use in order to effectively engage with local communities...*', the HBF considers that the wording should be amended to '*..a*

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range number of techniques that a developer could use in order to effectively engage with local communities... in order to make it absolutely clear that not all consultation techniques will always be necessary or appropriate.

Table 4 - Consultees

For the purposes of accuracy please can you amend our entry under 'Housing groups and organisations' from 'House Builders Federation' to 'HBF (Home Builders Federation)' to reflect our organisation's recent name change

Evidence Gathering

The draft Statement of Community Involvement does not include any detailed information on specific types of evidence gathering that the Council will be undertaking in order to provide a sound basis for its new planning documents.

With regard to this and in order to comply with recent government guidance, the HBF believes that mention should be made to Housing Market Assessments. The Council will need to instigate this work (probably in association with some neighbouring local authorities and the Regional Assembly).

Resources

It is noted that the Council does not provide any detailed information on the likely scale and availability of resources at its disposal.

Consultation

I await the opportunity to be further involved in all aspects of the LDF generally as it evolves. We therefore look forward to being consulted in relation to all relevant planning policy documents at appropriate times during their evolution.

The Federation would appreciate being informed in writing of when any relevant DPD is being submitted to the Secretary of State, and when any DPD or SPD documents have been adopted by the Council..

I look forward to the acknowledgment of these comments

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	in due course.
Officer comments	<ul style="list-style-type: none"> • The general comments on advice available from the Planning Inspectorate and ODPM are noted. The LPA is aware of these. • With regards to comments on Supplementary Planning Documents (SPDs), the LPA is aware of the role that SPDs are required to play in the planning system. Details of matters of importance to development costs, such as planning obligation requirements, may be set out in SPDs which will in turn conform to policies in Development Plan Documents (DPDs) or saved policies in the Local Plan. • With regards to comments on public engagement techniques, it is the intention of the LPA to consult by letter or, where possible, by email. The LPA has a database of those that wish to be consulted on the LDF who will be contacted at various stages of its production. This database includes landowners, planning agents and developers who have made their interest in the process known to the LPA. The HBF are included on the database. Regulations 17 and 24 require the LPA to consult specific consultation bodies, but the LPA understand that it is not a requirement to issue all those that it consults with a copy of the documents as long as such documents are made available. The HBF is listed in Annex E of PPS 12 as one of a number of organisations that PPS 12 states Local planning authorities should consider the need to consult, where appropriate, in the preparation of local development documents. • Regarding comments submitted on Table 4 of the draft SCI, the LPA believes that the text should remain as 'should' rather than 'could'. The use of 'could' would act to downplay the importance of pre-application consultation and may make applicants less likely to undertake such exercises. Table 4 makes clear that not all techniques are appropriate for all scales of applications. • Comments regarding the recent name change are noted and the LPA will alter the text according in the SCI. • The evidence base is not included in the SCI as it is not anticipated there will be any significant

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	<p>public participation in this stage of the LDF. The LPA will consult specialist groups on relevant Sustainability Appraisals and Strategic Environmental Assessments.</p> <ul style="list-style-type: none"> Comments regarding resources are noted and have been brought up by other consultees. It is recommended that the SCI be amended to clarify that resources are available, as stated in Appendix 2.
RECOMMENDATION	<ul style="list-style-type: none"> SCI be amended to clarify that resources are available Alter consultation list to reflect HBF's recent name change

QUESTIONNAIRE QUESTION		AVERAGE (MEAN) 1 = Strongly disagree 10 = Strongly agree	AVERAGE (MODE) 1 = Strongly disagree 10 = Strongly agree
1. The level of community involvement is suitable		7.05	8
RESPONDENT	(SCORE) COMMENTS		
Home Builders Federation (HBF)	(7)		
OFFICER COMMENTS	Score noted		
RECOMMENDATION	No modifications be made to the SCI with regard to comments specifically submitted for this question on the questionnaire.		

QUESTIONNAIRE QUESTION		AVERAGE (MEAN) 1 = Strongly disagree 10 = Strongly agree	AVERAGE (MODE) 1 = Strongly disagree 10 = Strongly agree
2. The techniques and methods outlined in the Statement of Community Involvement will provide all, from all communities, an opportunity to become involved in the preparation of the Local Development Framework		7.11	8
RESPONDENT	(SCORE) COMMENTS		
Home Builders Federation (HBF)	(6)		
OFFICER COMMENTS	Score noted		
RECOMMENDATION	No modifications be made to the SCI with regard to comments specifically submitted for this question on the questionnaire.		

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QUESTIONNAIRE QUESTION	AVERAGE (MEAN) 1 = Strongly disagree 10 = Strongly agree	AVERAGE (MODE) 1 = Strongly disagree 10 = Strongly agree
3. The Statement of Community Involvement outlines how people can become involved in the preparation of the Local Development Framework.	6.95	7
RESPONDENT	(SCORE) COMMENTS	
Home Builders Federation (HBF)	(6)	
OFFICER COMMENTS	Score noted	
RECOMMENDATION	No modifications be made to the SCI with regard to comments specifically submitted for this question on the questionnaire.	

QUESTIONNAIRE QUESTION	AVERAGE (MEAN) 1 = Strongly disagree 10 = Strongly agree	AVERAGE (MODE) 1 = Strongly disagree 10 = Strongly agree
4. The Statement of Community Involvement outlines how people can put forward their views on individual planning applications.	6.63	8
RESPONDENT	(SCORE) COMMENTS	
Home Builders Federation (HBF)	(7)	
OFFICER COMMENTS	Score noted	
RECOMMENDATION	No modifications be made to the SCI with regard to comments specifically submitted for this question on the questionnaire.	

QUESTIONNAIRE QUESTION	AVERAGE (MEAN) 1 = Strongly disagree 10 = Strongly agree	AVERAGE (MODE) 1 = Strongly disagree 10 = Strongly agree
5. The methods of consulting and informing people on planning applications outlined in the Statement of Community Involvement allow people from all communities the opportunity to respond	6.84	8
RESPONDENT	(SCORE) COMMENTS	
Home Builders Federation (HBF)	(7)	
OFFICER COMMENTS	Score noted	
RECOMMENDATION	No modifications be made to the SCI with regard to comments specifically submitted for this question on the questionnaire.	

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QUESTIONNAIRE QUESTION		AVERAGE (MEAN) 1 = Strongly disagree 10 = Strongly agree	AVERAGE (MODE) 1 = Strongly disagree 10 = Strongly agree
6. The Statement of Community Involvement explained what the Local Development Framework is		7	7
RESPONDENT	(SCORE) COMMENTS		
Home Builders Federation (HBF)	(7)		
OFFICER COMMENTS	Score noted		
RECOMMENDATION	No modifications be made to the SCI with regard to comments specifically submitted for this question on the questionnaire.		

QUESTIONNAIRE QUESTION		AVERAGE (MEAN) 1 = Strongly disagree 10 = Strongly agree	AVERAGE (MODE) 1 = Strongly disagree 10 = Strongly agree
7. The Statement of Community Involvement makes clear how the results of public participation and consultation will be used.		6.58	8
RESPONDENT	(SCORE) COMMENTS		
Home Builders Federation (HBF)	(6)		
OFFICER COMMENTS	Score noted		
RECOMMENDATION	No modifications be made to the SCI with regard to comments specifically submitted for this question on the questionnaire.		

QUESTIONNAIRE QUESTION		AVERAGE (MEAN) 1 = Strongly disagree 10 = Strongly agree	AVERAGE (MODE) 1 = Strongly disagree 10 = Strongly agree
8. The Statement of Community Involvement explains how the Council will deliver feedback on comments and views submitted in respect of planning		6.83	8
RESPONDENT	(SCORE) COMMENTS		
Home Builders Federation (HBF)	(6)		
OFFICER COMMENTS	Score noted		
RECOMMENDATION	No modifications be made to the SCI with regard to comments specifically submitted for this question on the questionnaire.		

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QUESTIONNAIRE QUESTION	AVERAGE (MEAN) 1 = Strongly disagree 10 = Strongly agree	AVERAGE (MODE) 1 = Strongly disagree 10 = Strongly agree
9. The methods of pre-application advocated in the Statement of Community Involvement are suitable.	6.71	8
RESPONDENT	(SCORE) COMMENTS	
Home Builders Federation (HBF)	(5)	
OFFICER COMMENTS	Score noted	
RECOMMENDATION	No modifications be made to the SCI with regard to comments specifically submitted for this question on the questionnaire.	

QUESTIONNAIRE QUESTION	AVERAGE (MEAN) 1 = Strongly disagree 10 = Strongly agree	AVERAGE (MODE) 1 = Strongly disagree 10 = Strongly agree
10. The language used in the Statement of Community Involvement was easy to understand.	6.6	8
RESPONDENT	(SCORE) COMMENTS	
Home Builders Federation (HBF)	(6)	
OFFICER COMMENTS	Score noted	
RECOMMENDATION	No modifications be made to the SCI with regard to comments specifically submitted for this question on the questionnaire.	

QUESTIONNAIRE QUESTION	AVERAGE (MEAN) 1 = Strongly disagree 10 = Strongly agree	AVERAGE (MODE) 1 = Strongly disagree 10 = Strongly agree
11. The relevant groups and organisations to consult on planning matters have been identified and listed in Table 5 of the Statement of Community Involvement.	6.5	8
RESPONDENT	(SCORE) COMMENTS	
Home Builders Federation (HBF)	(6)	
OFFICER COMMENTS	Score noted	
RECOMMENDATION	No modifications be made to the SCI with regard to comments specifically submitted for this question on the questionnaire.	