

## **Appendix 2 Proposed Addendum to the Statement of Community Involvement**

### **ADDENDUM TO STATEMENT OF COMMUNITY INVOLVEMENT - TEMPORARY CHANGES IN RESPECT OF PUBLICITY OF PLANNING POLICY DOCUMENTS AND PLANNING APPLICATIONS DURING COVID-19 PANDEMIC (JANUARY 2021)**

#### **1 Summary**

- 1.1 During the ongoing COVID-19 pandemic, the Council is unable to operate community consultation on planning policy documents and some application types in the precise way set out in the Council's adopted Statement of Community Involvement (June 2020). This addendum sets out temporary changes to the publicity of planning policy documents and planning applications in line with changes to legislation and national guidance due to COVID-19.
- 1.2 The proposed amendments in the addendum are temporary and will apply up until such a time when legislation, guidance and national social distancing measures are amended or no longer in force. When such legislation, guidance and measures are no longer in force, the Council will safely revert back to the original Statement of Community Involvement which was adopted in June 2020.
- 1.3 This addendum should be read alongside the original adopted Statement of Community Involvement (June 2020), which can be found on the Council's website at: <https://www.threerivers.gov.uk/eqcl-page/statement-of-community-involvement>

#### **2 Planning Policy**

- 2.1 National Planning Practice Guidance (PPG) has been updated due to the COVID-19 pandemic and recommends that 'where any of the policies in the Statement of Community Involvement cannot be complied with due to current guidance to help combat the spread of coronavirus (COVID-19), the local planning authority is encouraged to undertake an immediate review and update the policies where necessary so that plan-making can continue'.
- 2.2 The Town and Country Planning (Local Planning, Development Management Procedure, Listed Buildings etc.) (England) (Coronavirus) (Amendment) Regulations 2020 have been changed to temporarily remove legal requirements to make certain planning policy documents available for inspection at premises and to provide hard copies on request.
- 2.3 Tables 1 and 2 of the SCI indicate the consultation techniques the Council intends to use in the review of the Local Plan and in order to engage particular consultation groups. Paragraphs 2.12-2.16 explain these consultation techniques in detail. Temporary amendments to some of these consultation techniques are necessary to allow plan-making to progress and to ensure that effective community engagement is possible by means which are reasonably practicable.
- 2.4 Table A below sets out how each of the consultation techniques will be used or temporarily amended in light of COVID-19 related restrictions and guidance.

SCI Ref.	SCI Statement	Change in approach
Paragraph 2.12 Table 1 Table 2	<p><u>“Written/email consultation.</u> Formal written consultation will be used as a means of consulting the Duty to Co-operate bodies that are listed in Appendix 1 and other consultees in Appendix 2 as appropriate. This will be done by means of a notification letter and or email, which will briefly outline the purpose of the public consultation, which documents are being consulted upon, how and when representations need to be submitted and how any further information can be obtained.”</p>	<p>Written/email consultation will continue to be used to consult the Duty to Co-operate bodies that are listed in Appendix 1 and other consultees in Appendix 2 as well as other interested parties on the consultation database. This will explain where the documents can be inspected online and contact details to the Planning Policy Department so that contact can be made from any person who may encounter difficulty in accessing online documents. Notifications will be sent by email in the first instance and by letter to any person or body who has not provided an email address previously.</p>
Paragraph 2.13 Table 1 Table 2	<p><u>“Documents available for inspection.</u> All documents in connection with a Local Plan review including any Sustainability Appraisals will be made available at Three Rivers House and all local libraries throughout the District during opening hours.”</p>	<p>Hard copies will no longer be made available at Three Rivers House or local libraries listed at Appendix 3 of the SCI. Instead, a public notice will be posted at Three Rivers House and all local libraries listed where possible. The notices will be posted in a position that can be seen and read from the public highway or other publically accessible vantage point. The notice will inform the reader of the relevant document/consultation and how and where documents can be viewed on the Council’s website. The notice will also include contact details to the Planning Policy Department so that contact can be made from any person who may encounter difficulty in accessing online documents.</p>
Paragraph 2.14 Table 1 Table 2	<p><u>“Details on the Council’s website.</u> All documents for public consultation, including supporting information will be posted on the Council’s website. <i>This will include details of when and where documents can be inspected.</i> It will be possible to download the documents in pdf (portable document format). Copies of documents may also be produced on CD Rom if there is a demand for this format.”</p>	<p>All documents for public consultation and supporting information will continue to be available online via the Council’s website. However, details of when and where documents can be inspected in hard copy will not be included as in so far as restrictions relating to COVID-19 are in force and this addendum to the SCI is applied.</p>
Paragraph 2.15 Table 1 Table 2	<p><u>“Details in press.</u> Formal notices giving details of documents and consultation exercises will normally be included in the ‘Public Notices’ section in the Watford Observer... Where possible, details of the consultation will also be issued to the Three Rivers Times.”</p>	<p>Public notices will continue to be published in press in so far as they are circulating in the District.</p>
Paragraph 2.16 Table 1 Table 2	<p><u>“Meetings with Stakeholders.</u> Meetings with stakeholders will take place where appropriate with both Duty to Co-operate bodies that are listed in Appendix 1 and representatives from other consultation bodies drawn from the groups in Appendix 2. Meetings will be held either at the Council offices or other suitable venues in the community.”</p>	<p>Whilst social distancing measures are in place, it will not be possible to hold face-to-face meetings. Meetings with stakeholders will therefore take place in a virtual setting in so far as social distancing measures are in place.</p>

**Table A**

2.5 Where access to documents online cannot be achieved, the Planning Policy Department can be contacted in the first instance for assistance in accessing online documents and then to request a hard copy of the relevant document by post. If online access is unachievable, the Council will provide hard copies on request where it is deemed safe to do so. The Council will continue to ensure that upon request, documents or extracts of documents are available in alternative formats (e.g. in Braille, large print) and in different languages.

2.6 The above changes apply to consultations undertaken in the context of the Local Plan review as well as any consultations that the Local Planning Authority must undertake in relation to Neighbourhood Planning. For consultations undertaken for Neighbourhood Plans by the qualifying body (Parish Council), Three Rivers District Council will work with and advise the qualifying body on appropriate engagement methods.

### 3 Planning Applications

#### 3.1 Duty Planning

3.2 Paragraph 5.2 of the SCI states that the Duty Planning Service operates from the Council's reception and telephone. The Duty Planning Service is not available for visits to the Council's reception but remains available on the telephone. The Duty Officer will be available by telephone between the hours of 10am-1pm Monday, Wednesday and Thursday.

#### 3.3 Consultation on Pre-Applications

3.4 Paragraphs 5.5-5.12 of the SCI sets out the Council's expectations for developers' undertaking pre-application consultation with the community. Table B below highlights where a change to approach is required due to COVID-19 related restrictions and guidance.

SCI Ref.	SCI Statement	Change in approach
Paragraph 5.6	"Pre application community engagement events... should be held in a <i>suitable place near to the development site or in a neutral area</i> "	Whilst social distancing measures are in place, it will not be possible to hold face-to-face meetings. Engagement/ interactive events will therefore take place in a virtual setting in so far as social distancing measures are in place.
Paragraph 5.11-12	"For such proposals, there should be at least <i>one interactive involvement event</i> ... Such an event might take the form of a <i>place check, enquiry by design event, exhibition and workshop, a planning for real exercise, public meeting</i> or similar, facilitated interactive event"	
Table 3: 'Major' Applications	" <i>Prepare circular information on the intention to make an application and distribute widely</i> "	The circulation of information in hard copy format should be avoided by developers undertaking community consultation on pre-applications; information should alternatively be distributed online.

**Table B**

3.6 Consultation on Planning Applications

3.7 Paragraph 5.13 of the SCI sets out a number of methods used by the Council to publicise planning applications to the community and organisations, including the display of site notices, the posting of neighbour notification letters, the publication of notices in the local press and the use of the Council's website.

3.8 The only change in respect of publicising planning applications relates to site notices; applicants are now sent a covering letter and site notice(s) by post and the onus is on the applicant to display notices on behalf of the Council. The applicant or agent is required to provide photographic evidence to the case officer to confirm that the site notice has been displayed. This process has been in place since 26 March 2020 and will be kept under review in light of restrictions and guidance.

3.9 The use of neighbour notification letters and the publication of notices in the local press will be maintained.

**In the event of changes by the Government to the requirements for preventing the spread of COVID-19, this addendum will be reviewed and either updated or suspended, as appropriate.**

**JANUARY 2021**