

INSPECTOR'S REPORT
HARINGEY COUNCIL
STATEMENT OF COMMUNITY INVOLVEMENT

Inspector: Keith Holland BA(Hons) DipTP MRTPI ARICS

Date: 4th October 2007

Haringey Council Statement of Community Involvement (May 2007)

INSPECTOR'S REPORT

Introduction

- 1.1 An independent examination of Haringey Council's Statement of Community Involvement (SCI) has been carried out in accordance with Section 20 of the Planning and Compulsory Purchase Act 2004 (the Act), as applied by s18(4) of the Act.
- 1.2 Section 20(5) indicates the two purposes of the independent examination in parts (a) and (b). With regard to part (a) I am satisfied that the SCI satisfies the requirements of the relevant sections of the Act, in particular that its preparation has accorded with the Local Development Scheme as required by s19(1) of the Act.
- 1.3 Part (b) is whether the SCI is sound. Following Paragraph 3.10 of Planning Policy Statement 12: Local Development Frameworks, the examination has been based on the 9 tests set out (see Appendix A). The starting point for the assessment is that the SCI is sound. Accordingly changes are made in this binding report only where there is clear need in the light of tests in PPS12.
- 1.4 A total of 5 representations were received, all of which have been considered.

Test 1

- 2.1 The Council has undertaken the consultation required under Regulations 25, 26 and 28 of the Town and Country Planning (Local Development) (England) Regulations 2004.
- 2.2 This test is met.

Test 2

- 3.1 Paragraph 2.2 of the SCI acknowledges that the Local Development Framework (LDF) is a way of delivering the aims of the Sustainable Community Strategy (March 2007) and states that the Council will work with the Haringey Local Strategic Partnership to make sure that the content of the two documents complement each other.
- 3.2 The SCI also makes reference to other community strategies (Paragraphs 2.5 and 2.8), such as the Haringey Consultation Strategy and the Haringey Compact and states that consideration will be given to how these will be linked in terms of objectives and consultation.
- 3.3 This test is met.

Test 3

- 4.1 The Council has set out in Paragraphs 3.11 – 3.14 and Appendix 5 of the SCI those groups which will be consulted. The list in Appendix 5 includes the statutory bodies from PPS12 Annex E. It is stated at Paragraph 3.12 and also in Table 3 of the SCI that the Council holds a database of consultee details and that this will be updated as necessary. Furthermore, the Council states in Appendix 5 that it will consult with additional local stakeholders where appropriate.
- 4.2 The re-organisation of certain consultation bodies, such as the Strategic Rail Authority, should be acknowledged in the SCI and I recommend an additional sentence be added to this effect.

(R1) Insert the following to the end of the first paragraph in Appendix 5.

"Please note, this list also relates to successor bodies where re-organisations occur."

Additionally, there is one amendment to the lists in Appendix 5 that is necessary to make. As the organisation no longer exists remove the Traveller Law Reform Coalition from Appendix 5 and replace with Friends, Families and Travellers.

- 4.3 Subject to the recommendation above, this test is met.

Test 4

- 5.1 Paragraphs 4.15 – 4.20, Appendix 6 and Appendix 7 of the SCI show that the Council will involve and inform people from the early stages of Local Development Document (LDD) preparation and Paragraphs 3.17 – 3.19, Paragraphs 4.10- 4.14 and Appendix 2 set out the range of methods the Council will employ to do this. The Council clarifies in Tables 7 and 8 and in Appendix 6 and Appendix 7 the stages at which consultation will take place and who will be consulted at those stages. The SCI shows that consultation will take place with the key stakeholders during the issues and options stage of Development Plan Document (DPD) production in accordance with Regulation 25.
- 5.2 However, there are errors in both Table 7 and Appendix 6 that require correction. With regard to Table 7 it is necessary to clearly distinguish between the Preferred Options document (consulted upon under Regulation 26) and the final Submission document (consulted upon under Regulation 28).

(R2) The Council should make the following amendments to the row in Table 7 entitled 'Final version – Preferred Options'.

Amend the title of the above mentioned row to read "Preferred Options" and amend the information against this entry to read as follows:

"After consideration of the results of the Issues and Alternative Options consultation the Council will produce a Preferred Options document. This document will then be advertised for a six week period of consultation. The SA report will also be available for consultation during this period. Representations received during this consultation will inform the production of the final Submission DPD. The Council will also produce a summary report outlining any representations received during the formal consultation period and the Council's response. This will enable a clear link to be made between responses and Council decisions or actions. This summary of representations will also be available for inspection at the planning office, all Haringey libraries and on our website."

Add a new row to Table 7 entitled "Submission" to read as follows:

"The final version of the DPD will be prepared, called the Submission document. This will be accompanied by the final SA report which sets out the environmental impacts of the proposals. The Council will submit the final version of the DPD, SA and Consultation Statement to the Secretary of State. The DPD and SA will be available for formal consultation for a further six week period. Any representations made during this consultation period will be sent to and considered by the Secretary of State (through a Planning Inspector), published and then be made available in the same way."

(R3) Make the following amendments to Appendix 6.

Amend the second text box under Stage 2 to read "Public Participation on Preferred Options."

Amend the fourth text box under Stage 2 to read "Preparation of Submission Document."

Amend the fifth text box under Stage 2 to read "Submission of DPD and public participation on the Submission document."

5.3 The SCI has omitted a key stage in the DPD process if a document is concerned with allocations of land (Regulation 32). I, therefore, have the following recommendations to make to ensure that this stage of the process is taken into account.

(R4) Add the following to Table 7 immediately after the new Submission row:

"Should representations be received on a DPD that is concerned with allocations of land the Council will publicise these representations for an additional six week period of consultation."

Add the following to the first text box under Stage 3 in Appendix 6:

“(Should site allocation representations be received these will be advertised in accordance with Regulation 32.)”

5.4 As a result of these amendments I am satisfied that providing these stages are followed the consultation proposed will be undertaken in a timely and accessible manner.

5.5 Subject to the recommendations above, this test is met.

Test 5

6.1 Paragraphs 3.17 – 3.19, Paragraphs 4.10 - 4.14 and Appendix 2 set out the methods that the Council proposes to use to involve the community and stakeholders. These cover a variety of recognised consultation techniques that will present information via a range of different media. The Council acknowledges the benefits and disadvantages of the different methods in Appendix 2 and indicates in Appendix 6 and Appendix 7 at what stages of LDD preparation the various methods might be employed.

6.2 The SCI acknowledges at Paragraphs 3.13 – 3.14 that the Council may have to provide extra support to facilitate consultation with certain groups or individuals and proposes (at Paragraph 3.14) how it might do this. Paragraphs 3.5 -3.8 and Table 3 explain how the Council will make its information accessible to all members of society thus meeting the requirements of the Race Relations Act 2000 and the Disability Discrimination Act 1995.

6.3 I am satisfied that the methods of consultation proposed in the SCI are suitable for the intended audiences and for the different stages in LDD preparation.

6.4 This test is met.

Test 6

7.1 Chapter 6 of the SCI explains how the Council will seek to ensure that sufficient resources are put in place to achieve the scale of consultation envisaged. I am satisfied that the Council is alert to the resource implications of the SCI.

7.2 This test is met.

Test 7

8.1 Paragraphs 4.21 – 4.23 and Table 6 explain how the results of community involvement will be taken into account by the Council and used to inform decisions. Table 7 confirms that the Council also proposes to prepare reports at the end of the consultation period

explaining how views have been considered and documents changed in light of the community involvement. The amended Table 7 states where these will be made publicly available. However in the interest of clarity I recommend the following addition to Paragraph 4.22.

(R5) Add the following to the end of third sentence of Paragraph 4.22:

“These summary reports will be made available at the Council Offices, all public libraries in Haringey and on our website www.haringey.gov.uk.”

8.2 Subject to the recommendation above, this test is met.

Test 8

9.1 Paragraph 1.10 explains that the SCI will be formally reviewed after a period of 3 years in accordance with the LDS. This review will be used to refine the Council’s approach to community involvement within the three years. This paragraph also states that the Annual Monitoring Report will reflect on how the Council has achieved its standards with regard to community involvement.

9.2 I am satisfied that the Council has mechanisms for reviewing the SCI.

9.3 This test is met.

Test 9

10.1 Chapter 5 and Appendices 8, 9 and 10 of the SCI describe the Council’s policy for consultation on planning applications. Table 10 meets the minimum requirements and also provides information on additional methods of consultation. This chapter distinguishes between procedures appropriate to different types and scale of application and the ‘Decision Feedback’ element of Table 10 includes information on how the consultation results will inform decisions.

10.2 This test is met.

Conclusions

11.1 Table 1, in both the Executive Summary and the main document and also Table 5 contain timeline information. With regard to Table 1, this information will become redundant once the document is adopted and should therefore be removed.

(R6) Remove the column containing the timeline information from both versions of Table 1.

Also as both the dates and indeed the content of the Local Development Scheme may change over time the Council should make the following amendments to Table 5.

- (R7)** Remove the specific dates from Table 5 and insert the following immediately beneath the table:

“As the contents of the Local Development Scheme may change over time please visit our website www.haringey.gov.uk for the most up to date version of our Scheme.”

- 11.2 The SCI contains sections of text that would become redundant once the document is adopted, for example Paragraphs 1.11 – 1.12. I recommend accordingly below.

- (R8)** The Council should remove all references to previous stages of this document.

- 11.3 In the event of any doubt, please note that I am content for such matters as any minor spelling, grammatical or factual matters to be amended by the Council, so long as this does not affect the substance of the SCI.

- 11.4 Subject to the implementation of the recommendations set out in this Report, Haringey Council’s SCI (May 2007) is sound.

Keith Holland

Keith Holland
Inspector

APPENDIX A
TESTS OF SOUNDNESS

Examination of the soundness of the statement of community involvement

3.10 The purpose of the examination is to consider the soundness of the statement of community involvement. The presumption will be that the statement of community involvement is sound unless it is shown to be otherwise as a result of evidence considered at the examination. A hearing will only be necessary where one or more of those making representations wish to be heard (see Annex D). In assessing whether the statement of community involvement is sound, the inspector will determine whether the:

- i. local planning authority has complied with the minimum requirements for consultation as set out in Regulations;¹
- ii. local planning authority's strategy for community involvement links with other community involvement initiatives e.g. the community strategy;
- iii. statement identifies in general terms which local community groups and other bodies will be consulted;
- iv. statement identifies how the community and other bodies can be involved in a timely and accessible manner;
- v. methods of consultation to be employed are suitable for the intended audience and for the different stages in the preparation of local development documents;
- vi. resources are available to manage community involvement effectively;
- vii. statement shows how the results of community involvement will be fed into the preparation of development plan documents and supplementary planning documents;
- viii. authority has mechanisms for reviewing the statement of community involvement; and
- ix. statement clearly describes the planning authority's policy for consultation on planning applications.

From: Planning Policy Statement 12: Local Development Frameworks

¹ The Town and Country Planning (Local Development) (England) Regulations, 2004.