

Tests for Soundness of the Statement of Community Involvement (SCI)



An Inspector will examine a submitted Statement of Community Involvement. The purpose of this examination is to consider the soundness of the document. To assess this, the Inspector will determine whether certain tests of soundness have been satisfied (tests are shown below).

Epsom and Ewell Borough Council prepared the submitted SCI with these criteria in mind and have conducted their own assessment of the document against the tests of soundness.

Tests of soundness (taken from PPG12)

- 1) The local planning authority has complied with the minimum requirements for consultation as set out in Regulations (The Town and Country Planning (Local Development)(England) Regulations 2004)
- 2) The local planning authority's strategy for community involvement links with other community involvement initiatives e.g. the Community Strategy
- 3) The statement identifies in general terms which local community groups and other bodies will be consulted
- 4) The statement identifies how the community and other bodies can be involved in a timely and accessible manner
- 5) The methods of consultation to be employed are suitable for the intended audience and for the different stages in the preparation of local development documents
- 6) Resources are available to manage community involvement effectively
- 7) The statement shows how the results of community involvement will be fed into the preparation of development plan documents and supplementary planning documents
- 8) The authority has mechanisms for reviewing the Statement of Community Involvement
- 9) The statement clearly describes the planning authority's policy for consultation on planning applications

The table below displays the assessment conducted by Epsom and Ewell Borough Council. The Specific Tests relate to those provided in the Planning Inspectorate's 'Local Development Frameworks: Assessing the Soundness of Development Plan Documents and Statements of Community Involvement'. Each specific test corresponds with one of the tests of soundness. This is indicated by the test number e.g. **9**).

Assessment of the Statement of Community Involvement against the Tests of Soundness

Test area	Specific Tests	Responses
Does the SCI meet minimum requirements?	<p>1) The SCI should meet the minimum requirements (Regulations 25, 26 & 27 – for DPDs and 17 & 18 for SPDs). Also Regulation 2, where some degree of flexibility is allowed. The SCI should set out how consultation and participation is conducted during the preparation of these documents.</p>	<ul style="list-style-type: none"> • A description of the Council's policy for consultation on the production of LDDs is set out in Section 2.1. • Chart 1 clearly displays the consultation process during the preparation of SPDs and DPDs, highlighting at which stage Regulations 17-18 and 25-27 will be satisfied. This process is expanded upon in more detail in the following section. • Table 3 categorises the stakeholders that are to be consulted, ensuring that all groups are represented and statutory consultees are included. • The methods of consultation that are to be used (or considered optional) during the production of DPDs / SPDs are tabulated in Table 4.
	<p>9) The SCI should meet the minimum requirements set out in Article 8, Parts 3,4 and 8 of the Town and Country Planning (General Development Procedure) 2004 or Sections 67 & 73 of the Planning (Listed Buildings & Conservation Areas) Act 1990 for development affecting a listed building or the character or appearance of a conservation area.</p>	<ul style="list-style-type: none"> • A description of the Council's policy for consultation on planning applications is set out in Section 2.2. • The Statutory Minimum Requirements that the Council will satisfy with regards to consultation on planning applications are listed in Table 5. • Table 5 also identifies proposed arrangements that the Council will undertake in addition to the Statutory Minimum Requirements.

Who will be consulted?	<p>3) Does the SCI demonstrate how the community and stakeholders will be involved in the preparation of LDDs? Is it sufficiently clear which community groups and other bodies will be consulted on the preparation of DPDs?</p>	<ul style="list-style-type: none"> • The types of community groups to be involved in the preparation of LDDs are listed in Table 3. • These include the Specific Consultation Bodies and many others listed in Annex E of PPS 12. • Table 4 depicts the methods that will / may be used to consult these groups, while sections 2.1.2 to 2.1.4 identify the different stages of community involvement.
	<p>9) Is it clear what type and scale of application should be subject to wider consultation than the statutory minimum? Are the types of consultation expected at different stages of an application's preparation and determination differentiated? In particular does the SCI set out the local authority's policy towards pre-application consultations, including the expected role of applicants?</p>	<ul style="list-style-type: none"> • Table 6 provides guidance on which type of applications are likely to be subject to wider consultation. • However, as mentioned in the text it is impossible to provide a definitive list of application types and circumstances where this might apply as the consultation requirements need to be considered on the individual application. • Section 2.2 on Planning Applications, provides information relating to consultation during the different stages of an application. This includes pre-application, submission, decision stage and also the process should an application be revised. • Section 2.2.2 discusses pre-application consultations and the expected role of applicants.
Has the local authority proposed a 'joined-up' approach	<p>2) Is it clear how the local authority will ensure the process of community involvement for DPD production will be linked to that for other strategies which are relevant to the DPD in question? Does the SCI indicate how the local planning authority will link consultation exercises on different DPDs where appropriate?</p>	<ul style="list-style-type: none"> • It is stated in section 2.1.1 that the LDF and Community Strategy are closely linked, with the LDF helping to express spatially, parts of this Strategy • It is mentioned beneath Table 4 that should the consultation periods coincide for various DPDs, the Council will endeavour to combine the consultation process to maximise resource efficiency

Are the methods accessible and appropriate?	<p>4) Will the identified arrangements be well timed and accessible?</p>	<ul style="list-style-type: none"> • The consultation arrangements, in line with legislation, ensure adequate time is given for respondents to make a thorough assessment of any LDD at a number of points throughout its preparation. The stages of involvement are depicted in Chart 1. • The range of methods that may be used in the consultation process and the availability of documents on the internet, in libraries and at the town hall, ensures good accessibility to the consultation process.
	<p>5) Are the methods appropriate for a range of groups? Are the methods appropriate for the type of LDDs?</p>	<ul style="list-style-type: none"> • Table 4 display's the various methods of consultation that may be used during the production of LDDs. The different types of documents to be produced are also differentiated. • The variety of methods that may be selected from will help ensure that a wide range of groups are consulted (as identified in Table 3).
	<p>9) Is the approach to consultation on planning applications accessible and appropriate for a range of groups?</p>	<ul style="list-style-type: none"> • The statutory minimum requirements will be exceeded for planning applications (Table 5). These extra, proposed arrangements will help to ensure consultations are timely and accessible.
Is the SCI realistic and effective?	<p>6) Is it clear how the local planning authority will manage the processes in terms of staff time and availability, accommodation, funding for community exercises etc? Is it clear that sufficient resources are available to manage wider consultations on large applications?</p>	<ul style="list-style-type: none"> • Section 1.3.3 provides information relating to the resource implications of various consultation methods. • It is stated that the scale of the consultation will reflect the resources available in terms of staff and cost. These resources will be set through the Council's budgeting process. • A consultation Plan will therefore be established early on in the process to ensure that sufficient resources are available for consultations.

	<p>7) Is it clear how the results of consultation will be reported and inform the content of LDDs and decisions on planning applications?</p>	<ul style="list-style-type: none"> • With regard to LDDs, information on how consultation comments are dealt with is provided in section 2.1.3. • For planning applications, this information is provided under the 'Deciding Applications' paragraph in Section 2.2.4. • Appendix 3 'Methods of Analysis' details how the responses received from various consultation exercises will be handled. • Appendix 4 'Feedback' provides information on how responses received during a consultation exercise are presented to the community.
	<p>8) Is it clear what will trigger a review of the SCI?</p>	<ul style="list-style-type: none"> • The Introduction states 'revisions are likely to take place when significant changes have occurred to the types of groups, which the Council wishes to engage, or when different techniques for engagement are to be employed'.