

# Statement of Community Involvement



How the council intends to engage the community in planning

February 2019

## Statement of Community Involvement 2019

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## 1 Introduction

**1.1** Statements of Community Involvement (SCI) provide a framework for future consultation and community engagement in planning, to offer both transparency in planning communications and a flexible approach to all future consultations within this overall framework. SCIs are a legal requirement and form part of the evidence to support the process of producing a Local Plan.

**1.2** The requirements for early public engagement and consultation on plan-making, planning applications, neighbourhood planning, and the Community Infrastructure Levy (CIL) are set out in legislation. This document sets out how and when the Council's Planning Service will involve local residents, local businesses and other key organisations and stakeholders in the plan-making process and in the determination of planning applications. It also explains how public engagement and consultation will be taken forward to support the Government's localism agenda - specifically the Community Infrastructure Levy (CIL), spending priorities of the Wandsworth Local Fund (neighbourhood CIL) and neighbourhood planning. In practice the Planning Service will meet at least the minimum requirements of the relevant planning legislation as stated within the document, and in many cases this will be exceeded. The SCI seeks to address and expand upon minimum requirements where possible to improve the effectiveness of community involvement in all aspects of Wandsworth's Planning Service. As consultation legislation may change within the lifetime of the SCI, it is prudent to communicate the key principles of public involvement in planning to guide future engagement and consultation arrangements to ensure that the Planning Service continues to put into practice active, meaningful and continued involvement of local communities and stakeholders.

**1.3** The Council first adopted its SCI in 2007 which was then reviewed and updated in 2012. There is a requirement to keep the SCI relevant and up to date by monitoring and reviewing established communication processes against broad principles of engagement and consultation. Since the last SCI was adopted in 2012, there have been a number of changes relating to planning legislation, permitted development and localism, alongside technological advances, such as the introduction of high speed broadband to Wandsworth's housing estates, widespread use of smartphones and social media. The Council now has its own Twitter and Facebook accounts and more services and functions are provided online and are smartphone enabled. These changes also include a new 'Duty to Co-operate' with neighbouring boroughs on cross boundary issues, and legislative changes simplifying the plan-making process and the introduction of localism which aims to give new rights and planning powers to local communities.

**1.4** Engaging with residents and other stakeholders is key to the Council's commitment to meeting the Public Sector Equalities Duty (Equality Act 2010) and to better understand the needs of diverse and 'Hard to Reach' groups and ensure they have an opportunity

to participate in the planning process. Cost-effective ways of community engagement will continue to be explored whilst ensuring that it is equitable, inclusive and fit-for-purpose.

**1.5** The SCI has been prepared under the Planning and Compulsory Purchase Act 2004, the Localism Act 2011; the Town and Country Planning (Local Planning) Regulations 2012; the Town and Country Planning Development Management Procedure (England) Order 2010; the National Planning Policy Framework 2018 and the Community Infrastructure Levy Regulations 2010 (as amended).

**1.6** The following sections of this report describe consultation in the context of key principles and legislative requirements in the three core areas of the Wandsworth Planning Service: local plan-making; localism (including neighbourhood planning); and development management. The final chapter considers resourcing and future updates of the SCI. A list of consultees and consultation methods to be undertaken for local plan-making and development management are set out in Appendices 1-3

**1.7** The draft SCI, was consulted on between 30 October and 11 December 2018 for a period of 6 weeks and responses were considered against the scope and purpose of the document. Only minor changes were required and these have been incorporated into this final version.

## 2 The principles of public involvement in planning

**2.1** This section sets out the core principles of public involvement that underpins how the Planning Service engages and consults with the public and stakeholders. It reviews and updates existing channels of communication and aims to inform future arrangements to achieve best practice and a consistent approach throughout the 5 year lifespan of the SCI so that the approach to consultation and engagement incorporates these key principles - Council-wide public engagement arrangements; use of digital communications and social media; and addresses equalities and engagement with traditionally 'Hard to Reach' groups.

### The Principles of Engagement

**2.2** The term 'Community engagement' is often used as an umbrella term to cover the whole range of public involvement and consultation. Its precise meaning however refers to those actions and processes which take place to establish an effective relationship with individual and organisational stakeholders. Building effective relationships is important, as the future conduct of consultations and other forms of interaction depend upon the nature of the relationship, and to articulate realistic expectations and to set these out at the beginning. Achieving effective community involvement in the planning process can have several benefits including: more focus on the priorities identified by the community; ability to draw upon a local knowledge base; increased community commitment to the future of an area; and increased support for the Planning Service. This enables communities to have a better understanding of how planning policies are developed and how decisions are made.

### Wandsworth's Corporate Approach

**2.3** Corporately the Council takes account of the key principles of consultation, which are best summarised in what is termed 'the Gunning Principles'. These are:

- Consultation should be undertaken when proposals are still at a formative stage - Public bodies need to have an open mind during a consultation and not have already made the decision, but have some ideas about the proposals.
- Consultations should give sufficient reasons for any proposal to permit 'intelligent consideration'. People involved in the consultation need to have enough information to make an intelligent choice and input into the process.
- Adequate time must be given for consideration and response.
- Responses must be conscientiously taken into account.
- The degree of specificity regarding the consultation should be influenced by those who are being consulted.
- The demands of fairness are likely to be higher when the consultation relates to a decision which is likely to deprive someone of an existing benefit.

## **The Approach to Community Involvement in the Planning Service**

**2.4** Local communities are those that are most affected by development in their areas and who know the most about their neighbourhood. There are many benefits to involving local communities in considering planning applications for their area, as well as local plan making such as:

- detailed local knowledge, expertise and perspective of local people, organisations and community groups;
- greater understanding of, and support for local policies, strategies and decisions;
- community commitment to the future development of their area; and
- improving the quality of life, and of the built and natural environment of the Borough.

**2.5** The National Planning Policy Framework (NPPF) emphasises the importance of early, proportional and effective engagement and collaboration with communities, local organisations, businesses, infrastructure providers and operators, and statutory consultees in plan preparation. This, alongside the accompanying guidance (NPPG) and the Town and Country Planning (Development Management Procedure) (England) Order 2015, sets out the legal framework for publicising planning applications and related regulatory permissions. Appendix 2 and 3 set out the Council's approach to consultation methods for plan making and planning applications.

### **Principles of public involvement and engagement in planning**

**2.6** The following key principles of the Planning Services's consultations take account of the 'Gunning Principles' listed above and are summarised in table 1 below. The second and third columns of table 1 and Appendices 2 and 3 set out how the 'Gunning Principles' and the planning consultation principles listed below are translated into the public engagement and consultation methods currently undertaken and forecast to be undertaken through the lifetime of the SCI.

<b>EFFECTIVE</b>	<b>Ensure early engagement. Carry out targeted consultation to ensure relevant stakeholders are engaged. Promote electronic communication to make communication quicker and easier to manage.</b>	<b>Provide sufficient and relevant reasoning and information to enable informed responses. Employ appropriate consultation methods.</b>
<b>TRANSPARENT</b>	<b>Clearly express purpose and scope.  Require that everyone connected to the proposal including respondents identify themselves and who they represent.</b>	<b>Affected parties are given adequate time to respond.  Identify any conflicts of interest.</b>
<b>PROPORTIONAL</b>	<b>Level of consultation and resources are proportionate to the scale and impact of proposal/consultation document.</b>	<b>Affected parties are given adequate time to respond.  Clarify the consultation process and key dates and where relevant information can be accessed.</b>
<b>INCLUSIVE</b>	<b>Ensure a cross-section of stakeholders is involved and that this is recorded to enable monitoring.</b>	<b>Utilise a wide range of consultation, methods and a variety of media.</b>
<b>COHERENT</b>	<b>Clearly summarise key issues/options/policies/proposals to guide responses.</b>	<b>Use plain English and present key documents in an easy to read format.</b>
<b>ACCOUNTABLE</b>	<b>Publicise responses and provide feedback.</b>	<b>Explain and give reasons how, why and where responses have or have not shaped changes to policies or affected the outcome of a proposal.</b>

Table 1

## Types and methods of Community Involvement

**2.7** The types and methods of community involvement the planning service will use has been informed by our existing experience and practice and analysis of previous consultations on planning documents. The overarching principles of consultation and how these are translated into the Planning Service’s public involvement methods are listed in Appendices 2 and 3. The following points give further explanation as to the consideration of the methods applied in accordance with the Gunning principles specifically:

- Consultation Should be Undertaken When Proposals Are Still at a Formative Stage:

In the preparation of its new Local Plan, the Planning Service must carry out a broad issues and options stage which identifies and seeks views on key issues, challenges and evidence. As Wandsworth is undergoing major growth and change, the Planning Service will go beyond the statutory minimum legislative requirements to carry out an extra non statutory consultation stage to further articulate the key issues. Statements of Consultation will be produced after every consultation stage to explain how the Planning Service has actively sought to identify and engage with residents and stakeholders and to summarise and consider responses made. The Council's established practice of meeting with key partners will continue in the plan making process. When large-scale development is proposed, or a major planning application is submitted, it may also be considered appropriate (at the discretion of officers) or on a draft local plan, to include an article for publication in the Housing department's own magazine (Homelife) and in the Corporate publication Brightside which is sent to all Council tenants and households in the Borough. This will ensure that residents will be informed on how to participate at the initial stages of policy formulation, and enable a wide coverage of publicity. The Planning Service will continue to make best use of electronic communication and will create a fully detailed and up to date web page dedicated to the Local Plan Review and will also continue to enable and carry out electronic notification to residents, groups and businesses who have arranged to receive e-notification of all planning applications within a specific area. This is a proactive process and tool, ensuring that opportunities to comment on planning applications are not missed and notification takes place at the earliest opportunity. Use of social media such as Twitter is a useful channel for publicising live consultations and use of online consultation methods, questionnaires and a mobile-enabled website will also continue to be used to provide 24 hour access to Planning Services outside of normal office hours. Twitter or related social media will provide a direct link to consultation events and help to maximise involvement by engaging with those sectors of the population that tend to rely on social media for news and for contacting the Council.

- Sufficient Information, Effective and Proportional:

The Local Planning Application Requirements (LPAAR) ensure that planning applications are accompanied by sufficient supporting information so that they can be validated to enable potential respondents to understand the proposal and make effective and informed comments. Supporting information such as updated evidence base documents are provided as part of Local Plan consultations to give meaningful context and background information when seeking views on policy options. The neighbourhood CIL (NCIL) / Wandsworth Local Fund part of the Council's website provide details of how to nominate or inform local CIL expenditure on projects in a resident's neighbourhood.

- Adequate Time, Proportionate and Coherent:

The Planning Service will continue its current practice which adds on extra time to respond to its planning documents where the consultation period includes a public holiday. This is considered best practice and can help gain a wider response.



- Responses Conscientiously Taken Into Account:

Statements of consultation for local plans and SPDs list those who responded, the comments made, the Council's response to these comments and whether any changes were made as a result of representations. These reports are published during the preparation of the Local Plan and are added to the Council's website.

- Demands of Fairness, Accountability and Transparency:

Planning reports including committee reports on planning applications and Local Plan and SPD consultation explain and give reasons why and where responses have or have not affected the outcome of a proposal or shaped changes to planning documents. . Planning officer reports balance representations made with other material considerations such as planning policy. Representations made on planning documents are reported in statements of consultation which provide a Council response to each representation made and whether it is considered to affect the outcome. This means that anyone reading the report can see the representations made and how the decision has been made as to whether or not to take a comment on board, and is therefore transparent and in the public domain.

**2.8** Since the first SCI was adopted there have been significant changes in the way people interact with the Council. Access to the internet has increased and there has been a large shift towards the use of online services. The majority of responses to consultations on planning policy and planning applications are now received online or by email rather than by post. The Council also makes best use of the wandsworth.gov.uk website, including consulting using an online interactive portal and displaying information through interactive policies maps where appropriate.

**2.9** The Planning Service's key aims take account of the NPPF (paragraph 16) which includes principles of public involvement, and the RTPPI best practice note on consultation. Whilst this largely re-expresses the 'Gunning Principles', it provides additional and specific guidance on public-sector planning consultations. The Planning Service will continue to assess the appropriateness of each consultation and aim to achieve proportional, and time and resource-efficient engagement.

### **Equalities - Engaging with 'Hard to Reach' groups**

**2.10** The Council also wants to open up more opportunities for people whose voices might not be so easily heard to be involved if they wish to. Wandsworth is an open and transparent Council, listening to residents and helping them influence service delivery. The focus is on local community engagement and ensuring that residents who are less heard, ('Hard to Reach' groups) are positively included in consultations. The Council and its planning functions need to ensure that it meets its duties under the Public Sector Equality Duty (Equality Act 2010), which aims to promote equality, eliminate discrimination and encourage good relations between different groups associated with

age, disability, sex, gender reassignment, race, religion, sexual orientation and other protected characteristics. Engaging with residents and other stakeholders is key to meeting this duty to better understand the needs of diverse groups and ensure they have an opportunity to comment on planning policy and development proposals. To achieve this, the Planning Service will continue to engage with established partnerships, community groups and organisations, and maintain an extensive and up-to-date consultation database to facilitate reaching and gathering views from a wider range of people and organisations.

**2.11** The Council recognises that planning material is often technical in nature, so consultation documents will be as clear and concise as possible, using plain English and avoiding or at least explaining 'jargon' (possibly in a 'a glossary of terms') without detracting from the complexities of issues involved. A duty planner is also available to assist with consultation queries including viewing principles of draft plans or interpreting planning application drawings, and answering telephone queries.

**2.12** Whilst there has been a shift towards online services and correspondence by email and social media, there remain a significant number of people that are unable to use electronic forms of communication and access to information, or prefer not to do so. As such, the Planning Service will continue to ensure that consultation materials can be made available in a variety of formats, including paper copies, at accessible locations such as local libraries and that there are varied ways of participating in consultations. An individual can also request to be automatically notified of new planning applications in their chosen area of Wandsworth.

**2.13** The social inclusion agenda has identified the need to redress the balance of public involvement and to make greater efforts to enable participation from people and groups that have been traditionally been under-represented in the planning process. The Council has ensured that the corporate approach to equality and diversity in service provision is reflected in consultation and communications approaches set out in the SCI.

**2.14** There is a requirement to carry out an Equalities Impact Needs Assessment and comply with the Equalities Act as set out above, and there is a legal requirement to consider the impact of Wandsworth Council's work on race equality under the Race Relations (amendment) Act 2000 and as well as the Disability Discrimination Act (DDA) 2005. In line with best practice, the Council is committed to carrying out Equality Impact Assessments (EqIA) which consider all of its equality target groups. EqIA will support the Council's corporate equalities agenda and help embed equality and diversity into policies and practices. It is therefore important to that the Planning Service seeks to maintain its diverse consultation database, and it is recognised that the Service may need to take specific measures to engage with 'Hard to Reach' and other sections of the community. The Council recognises that not everyone has access to the internet, while the libraries provide a free way of accessing information and participating in online

consultations to the benefit of the 'Hard to Reach' groups, documents will also be available in a variety of formats to encourage the widest possible readership. This includes paper, electronic and large print and other formats on request.

### **Digital communications**

**2.15** The updated NPPF (2018) has introduced the expectation that plans should use digital tools to assist consultation and presentation of policies. Wandsworth already engages with communities at different stages using a multi-media approach as this can enable wider communities to become empowered and involved in the planning process and decision-making. New initiatives for resident engagement will be further explored such as the relaunched 'Let's Talk' approach as a core engagement mechanism with residents, to comply with a forthcoming corporate community engagement strategy. The corporate consultation portal 'Citizen Space' produces consultation material in easily understandable, multi format and accessible formats which aim to encourage engagement from 'Hard to Reach' groups and those who tend to use social media and the internet as their primary channel of communication and information. This format was recently used effectively in the Local Plan-making process and will be further considered in the future. Implementation of further contact channels is being progressed corporately, such as a public 'Web Chat' initiative and a social media customer channel - initially using Twitter which may be appropriate for planning engagement and publicity once established during the lifetime of the SCI.

**2.16** The Council's Initiative 'Online First' promotes the provision of Council services via its website. The Council's 'Digital Inclusion Program' aims to make sure that further shifts towards online service provision do not disadvantage certain groups. The Council aims to further improve resident and business access to faster and more reliable broadband services and is working with 'Community Fibre' to install broadband across its housing estates. As a result, Wandsworth has over a third of its public housing stock with fibre optic broadband connections, more than any other London borough. The plans for 2018 will take this up to two thirds coverage and better enable engagement with traditionally 'Hard to Reach' groups to access to the Planning Service online.

**2.17** Use of social media and the internet can also help reach a wider audience especially from younger members of the community who traditionally tend not to participate in planning. The Council use Twitter feeds to publicise and provide links to planning consultations and deadlines, and 'Citizen Space' software is used for engagement on expressing opinions in a simple multiple choice format on key consultation issues. For planning consultation this means maps and photos can be included alongside contextual information to make it more appealing and user-friendly. This method of communication also has the benefit of encouraging on-going engagement as the software encourages those who do engage on sometimes complex planning issues by providing short and easily-understood summaries of any consultation and to send participants a PDF of their response.

## Consideration of resources

**2.18** The concept of Best Value obliges the Council to regularly review whether their methods of delivering services or undertaking essential tasks meet the criteria of economy, efficiency and effectiveness. This means finding ways to observe the standard tests of Challenge, Comparison, Consultation and Competition in determining the ways in which to undertake public engagement. These principles will inform consultation decisions during the lifetime of this SCI.

### Personal data and data protection:

**2.19** The Council's overarching aim is to respect an individual's privacy and to protect the service user's personal information. The Council's website sets out its Privacy Notice which provides a summary on how the Council uses personal information in order to fulfil its statutory responsibilities as a Local Authority in the provision of services, explaining an individual's rights and measures that have been taken to protect the personal data the Council holds. It is intended that a webpage will be set up to provide a list of Council services, under each will be more information about how personal data is processed, who the Council may share. The EU's General Data Protection Regulation (GDPR) came into force on 25 May 2018 and supersedes the UK Data Protection Act 1998. The GDPR applies to personal data - this is any information that can directly or indirectly identify a person, and can be data held in any format. The GDPR expands the rights of individuals to control how their personal information is collected, processed and places a range of new obligations on organisations such as Wandsworth Council to be more accountable for data protection. The Planning Service follows the Council-wide commitment that personal data will be processed according to the six data protection principles:

- i. Processed lawfully, fairly and transparently;
- ii. Collected only for specific legitimate purposes;
- iii. Adequate, relevant and limited to what is necessary;
- iv. Must be accurate and kept up to date;
- v. Stored only as long as is necessary;
- vi. Ensure appropriate security, integrity and confidentiality.

**2.20** For the purposes of data protection, information the Council holds will only be used in connection with the planning documents that are being prepared and will not be passed on to anyone else other than those who are directly involved with preparing the planning documents unless the Council is required to disclose this information by law or by any government department or other regulatory authority. Where relevant, information may be disclosed to others outside the Council, for example the Planning Inspectorate when examining a Local Plan.

**2.21** In order to maintain an effective consultation database of those who have expressed an interest in any of the planning documents being prepared, a record of an individual's name, address, and contact details is kept on the consultation database along with any comments made. Consultation responses cannot be made anonymously as this precludes transparency in the planning process, and the public are entitled to view comments made, with information such as addresses and email addresses redacted. Where these are published on the Council's website, personal details such as your address, phone number, email and signature will be redacted. The Council is required however, to make copies of responses available to view at the planning office on request and this may include original correspondence. Individuals who no longer wish to be contacted by the Council's Planning Service about any planning documents, or those who have previously signed up for notification of planning applications in an area, can contact the Council to request removal of their details at any time. Further details are contained in the Council's [Privacy Statement](#) on its website.

## 3 Involving the community in the Wandsworth Local Plan

**3.1** Community involvement is vitally important as planning shapes the places where people live and work, therefore local people should be able to take an active part in the process. It is also important that the community can be involved from the beginning of the process, identifying issues and debating options from the earliest stages. In accordance with the broad principles of public involvement set out in the previous chapter, and guided by relevant legislation, this chapter sets out broadly how, when and who will be consulted throughout the preparation of a local development plan and other statutory planning documents prepared by the Council. Consultation on local planning documents will continue to meet at least the minimum requirements under the current local plan-making legislation and often would go beyond this if it considered to be in the public interest. This chapter reviews how and when the community and key stakeholders can get involved in local plan-making, including Supplementary Planning Documents (SPDs). The Council is required to also consult its statutory partners in local plan-making and Appendix 1 contains the list of statutory and non-statutory consultation partners, stakeholders and types of organisations that are consulted at various times of plan-production.

### Engagement in the local plan process

**3.2** The National Planning Policy Framework (NPPF) 2018 sets out updated national policy and plan-making requirements. The Local Plan refers to the collection of documents that make up the statutory plan for the Council which has to be in accordance with procedures set out in the Town and Country Planning Act, the NPPF and be in general compliance with the London Plan.

**3.3** Wandsworth's Local Plan documents were adopted in 2016, and an Employment and Industry Policies Local Plan Document is at an advanced stage of production. The Council is currently in the early stages of producing the full review of its Local Plan which will identify issues and with stakeholder engagement. This review must take into account the NPPF and the London Plan to ensure that Wandsworth's policies are in line with the Government's and Mayor's policies and procedures.

**3.4** The documents that make up the Wandsworth Local Plan set out how growth and development will be accommodated and managed in Wandsworth. The various elements of the system are explained in the diagram below. These documents form the statutory development plan for the Borough, alongside the London Plan. As part of this process the Council's SCI forms part of the evidence supporting its draft Local Plan for examination by the Planning Inspectorate. The Council's current planning policy documents ('the Local Plan') comprise:

- Adopted Development Management Policies Document (DMPD) - sets out additional planning policies that will be used when making decisions on planning applications;

- Adopted Site Specific Allocations Document (SSAD) - sets out proposals for sites that are expected to experience significant development;
- Emerging Local Plan Employment and Industry Document (LPEID)
- Supplementary Planning Documents (SPDs) - provide detailed guidance on how our planning policies will be implemented for specific topics;
- Local Development Scheme (LDS) - sets out our timetable for producing Wandsworth's planning policy documents and strategies;
- Policies Map – showing planning policy designations and constraints; and;
- Authority Monitoring Report (AMR) - assesses the performance of our planning policies documents by considering their performance against a set of indicators.

**3.5** Supplementary Planning Documents -add further detail to the policies in the Local Plan. They can be used to provide further guidance for development on specific sites, or on particular issues, such as design. SPDs are a material consideration in planning decisions but are not part of the development plan. A list of these documents and a timetable for their production is set out in the Local Development Scheme (LDS). Public engagement and the consultation process is broadly aligned with that of local plan production requirements, and the broad consultation principles set out in section 2, but proportionality is applied to this process given the more limited scope of these documents.

· Local Development Scheme (LDS) - This sets out the intended timetable for producing the Local Plan documents and must be published on the Council's website and kept up to date. Wandsworth's latest LDS was updated and adopted in 2017. This provides a timeframe for the production of Local Planning documents and SPDs thereby improving transparency in the plan-making process by assisting the public and other key stakeholders to plan engagement, track the progress of draft documents, and in committing the Council to keeping its planning framework up to date via accessible reporting in the Authority's Monitoring Report. This, along with this SCI report, sets out the Council's arrangements for involvement of the public and other stakeholders in the preparation of Local Development Documents and in consultation on planning applications for development proposals, and is available for the public to view on the website.

· Monitoring - The progress of Local Plans is monitored in the Authority's Monitoring Report. This records and assesses the effectiveness of key policies and progress against targets and milestones for the preparation of a local plan, including any requirement to amend the Local Development Scheme. Details can be found on the Council's website at: [www.wandsworth.gov.uk/amr](http://www.wandsworth.gov.uk/amr)

**Fig 1 Wandsworth’s Planning Policy Framework**

National planning guidance	Wandsworth’s Local Plan	Supplementary Planning Documents	Other documents
NPPF 2018	Core Strategy	Topic –based SPDs and SPGs	Annual Monitoring Report
Updated national waste planning policy: Planning for sustainable waste management	Development Management Policies Document	Conservation Area Character Appraisals/Strategies	Local Development Scheme
	Site Specific Allocations Document (SSAD)	Emerging SPDs	
	Policies Map		
	Emerging Local Plan Employment and Industry Document		
	London Plan		
	Emerging London Plan		
	Emerging Full Review of the Wandsworth Local Plan		

**Forthcoming Consultation**

**3.6** The Council is commencing work on the full review of the Wandsworth Local Plan. The minimum requirements of how and when engagement and consultation takes place is set out in local plan-making regulations and may be subject to change during



the lifetime of this SCI. Preparation, engagement and consultation of the full review of the Local Plan is intended to take place according to the current arrangements as summarised in the table below. Broad issues will be identified early on in the process, and then following feedback, the Council will use the responses to guide a more focussed policy options consultation which will propose draft policies and alternative options. The Regulations do allow for some flexibility in how consultation and engagement take place, and as such the Council intends to carry out additional engagement in the preparation stage to fully explore the issues to enable robust policy options to be identified. The stages and types of publicity and consultation we will carry out are set out in legislation as explained in the table below, and Appendix 2 sets out a range of Wandsworth's Local Plan consultation methods used.

**3.7** At each stage, the draft plan will be accompanied by a Sustainability Appraisal (SA) which would be also made available for comment as part of the Local Plan consultation: Sustainability Appraisal is an ongoing process at each stage of Local Plan production. The SA report documents the predicted positive, negative or neutral effects of policy options on the list of social, economic and environmental baseline and objectives, and it provides part of the evidence base for selecting preferred policy options. The initial scoping stage and the following sustainability reports must undergo consultation including with the statutory Strategic Environmental Assessment (SEA) organisations such as Natural England.

**3.8** Following the publishing of the 'Publication' version of the Local Plan for consultation, representations are forwarded to the appointed planning inspector for consideration with the Council's responses and if applicable, its suggested changes to the Plan. The responses will then be subject to independent scrutiny with a Planning inspector considering whether the plan is 'sound' and can be adopted. This scrutiny includes confirming that all the procedures are followed, that other relevant documents have been properly considered, and that representations have been taken into account. Further public engagement during the examination stage would then only take place at the direction of the planning inspector where further representations may be invited.

**3.9** Whilst the SCI describes how the Council involves the community under current plan-making legislation, future consultations will need to be carried out in light of any future changes to the Regulations. The Plan-making legislation requires that local planning authorities should work collaboratively with adjoining local planning authorities on strategic planning priorities, and to enable delivery of sustainable development in consultation with local enterprise partnerships and local nature partnerships, and to seek to cooperate with private sector bodies, utility and infrastructure providers. As many of these consultees are not locally-based, the Council will continue to make effective and appropriate use of digital tools to assist consultation and presentation of policies to facilitate engagement.

<b>LOCAL PLAN CONSULTATION STAGES</b>			
<b>STAGE</b>	<b>EXERCISE</b>		
<b>Stage 1</b>	<b>Preparation</b>	<b>Publish an Issues paper</b>	<b>Regulation 18 Policy Options consultation</b>
		<b>Publish Policy Options</b>	<b>Regulation 18 Policy Options consultation</b>
<b>Stage 2</b>	<b>Publication</b>	<b>Publish the submission version</b>	<b>Regulation 19 submission version consultation</b>
<b>Stage 3</b>	<b>Examination</b>	<b>Submission to Secretary of State</b>	<b>(The Planning Inspector will consider the responses)</b>
		<b>Examination/Hearing sessions</b>	
		<b>Publish Main Modifications if requested by the Planning Inspector during the Hearing sessions)</b>	<b>Carry out consultation on any Main Modifications (the Planning Inspector will consider the responses)</b>
<b>Stage 4</b>	<b>Adoption</b>	<b>Publish final document</b>	<b>Publicise the Notification</b>

Table 2

### **How we will engage: Types of Community Involvement and Consultation Methods**

**3.10** Based on our existing experience, practice and analysis of earlier consultations, there is a range of possible methods and types of community involvement that the Council will use in the Local Plan process which and is set out in more detail in Appendix 2.

**3.11** Since the first SCI was adopted there have been significant changes in use of the high-speed internet, smartphones and digital technology and a large shift towards online services. The majority of planning applications and responses to consultations on planning policy and planning applications are now received online or by email. The Planning Service also makes best use of the wandsworth.gov.uk website, consulting via the online interactive portal and displaying information through and interactive Policies Map where appropriate. To broaden engagement and achieve greater cost efficiencies, local plan publicity will continue to identify and exploit opportunities for utilising digital communications and social media, based on corporate policy as discussed in chapter 2.

**3.12** The Council recognises that not everyone has access to the internet. While the libraries provide a free way of accessing information and participating in online consultations, documents will also be available in a variety of formats to encourage the widest possible readership. This includes paper, electronic and large print and other formats on request.

**3.13** The Council supports local and community feedback, for example it currently holds monthly 'Let's talk' ward-level meetings for residents to provide feedback and ask questions to their ward Councillors. The SCI relates to planning only, and for other projects, such as environmental enhancement the Wandsworth Local Fund may be such an opportunity to propose community-led initiatives.

### **Community Involvement**

**3.14** Community Involvement in the process of producing the Local Plan document will be in line with the stages set out in Table 2. General consultation methods are set out in Appendix 2, and for each stage of engagement the Council will comply with the relevant regulations and be informed by the core principles of community engagement discussed in chapter 2. Not every technique is appropriate at each stage of production for each type of Planning Document and the Council will take into account proportionality and resources relative to the scope of each stage.

**3.15** These methods, alongside the regulations on preparing a neighbourhood plan, will also guide consultations on any neighbourhood plan that may be submitted to the Council.

**3.16** The legislation seeks stakeholder involvement in the plan making process as early as possible and lists those organisations that the Council must consult (see Appendix 1). This process starts with a preparation stage, to seek comments and views on what the planning issues and challenges are facing the Borough to guide the more detailed policy stages. This is followed by Publication stage, when the proposed submission of what is considered to be the best strategy for the Borough is presented. It is important that those wishing to influence the Local Plan should comment at this stage. Those seeking changes at this point have to present evidence as to why the Local Plan is otherwise 'unsound'. Following this, the documents are submitted to the Secretary of State for independent examination.

## Reporting back

**3.17** The Council is committed to reporting back on the responses to consultation. Following each stage of public consultation we will:

- Give full consideration to all representations received and engage in further discussions where this will assist the Council in developing the document.
- Make all responses to Publication or Submission stage documents available on our website.
- Produce a Statement of Consultation report, detailing the comments we have received and explaining how we have dealt with comments and how they have affected the development of policy, at each stage of the Local Plan process.
- These reports will also be reported to committee alongside subsequent changes to the development plan or SPD; be available on the website; upon request; and at the 5 town centre libraries.

## **4 Localism: Publicity and Consultation for neighbourhood planning and Community Infrastructure Levy**

**4.1** The Localism Act (2011) sets out a series of measures transferring power away from central government and towards local people. They include: new freedoms and flexibilities for local government; new rights and powers for communities and individuals; reform to make the planning system more democratic and more effective. This Act passes significant new rights direct to communities and individuals, making it easier for them to get things done and achieve their ambitions for the place where they live. Neighbourhood planning is a new, community-led, level of planning. The Act contains many of the 'tools' to make localism happen, such as the preparation of neighbourhood plans and orders; setting charges for the Community Infrastructure Levy (CIL) and the wider use of CIL and the ability for a local community to have their say in how a proportion of CIL receipts is spent in their neighbourhood.

**4.2** Consultation and publicity requirements for neighbourhood plans and Development Orders are set out in the Act and the Neighbourhood Planning (General) Regulations 2012. Neighbourhood fora must undertake early consultation themselves before submitting the draft Plan to the Council. The Council would then publish the plan or order for formal consultation. This is then followed by an independent examination by a planning inspector and a referendum of the local neighbourhood. Consultation and publicity requirements for setting the CIL charge and on local CIL spending priorities will then be followed for the neighbourhood area. The Neighbourhood Planning Act 2017 (NPA 2017) seeks to strengthen neighbourhood planning and covers planning and compulsory purchase matters.

### **Undertaking neighbourhood planning**

**4.3** Communities wishing to undertake neighbourhood planning need to apply to become a neighbourhood area and make a separate application to become the representative neighbourhood forum, and can then be officially designated according to the Regulations, which involve meeting set criteria. Neighbourhood forums lead and manage the production of a neighbourhood plan. As set out in the legislation, a neighbourhood forum should be established with the express purpose of promoting / improving the social, economic and environmental wellbeing of an area and is required to have a written constitution, setting out how it intends to operate.

**4.4** Neighbourhood planning can involve the production of a neighbourhood plan and/or a neighbourhood development order (NDO). A neighbourhood plan sets out policies for the development and use of land for the area concerned. Once formally 'made' it forms part of the statutory development plan for its area (along with the Wandsworth Local Plan and the Mayor's London Plan) and the Council must use it when

making planning decisions within the neighbourhood area. To date, the Tooting Bec and Broadway Neighbourhood Area and Neighbourhood Forum is the only designated area and forum in the borough.

**4.5** The responsibility for the carrying out neighbourhood planning rests with the neighbourhood forum but for a neighbourhood plan to be found 'sound', a planning inspector must be satisfied that public participation and consultation has taken place at the relevant stages during the production of the plan in line with Regulations. Public consultation and publicity must be carried out in the respective neighbourhood for a period of at least 6 weeks. A designated forum would need to commit to resourcing the production of the plan throughout its various stages including undertaking a strategic environmental assessment of the draft neighbourhood plan. As part of the process for preparing neighbourhood plans, neighbourhood fora are encouraged to arrange community consultation events to establish the key issues within the area, gather evidence to support the plan, identify and generate options for policies, and to decide on the content of the neighbourhood plan. The wider community must be involved at all stages of neighbourhood plan preparation and the community will also have an opportunity to vote for or against the plan at the later referendum stage.

**4.6** To enable community engagement and participation objectives, the Planning Service can offer appropriate guidance, support and direction to local groups considering producing a neighbourhood plan. The Planning Service will therefore:

- Determine applications for the establishment of neighbourhood forums within the statutory timeframes.
- Determine applications to designate the 'neighbourhood area' following an application by a neighbourhood forum within the statutory timeframes. This identifies and formalises the area that the neighbourhood plan will cover.
- Assist neighbourhood groups to understand the scale and scope of neighbourhood planning.

**4.7** Potential neighbourhood groups will also be made aware of a number of useful sources of support and information to assist local communities considering a neighbourhood plan, such as Planning Aid, and this can be communicated to potential applicants. In addition the Council has a dedicated website page providing advice and information and will keep this up to date. A comprehensive list of links to other sources of information, advice and grant funding opportunities is also provided on the website, currently listed as:

- Communities and Local Government - Introduction to Neighbourhood Planning
- Planning Advisory Service (PAS)
- The Planning Portal
- Planning Aid for London
- Locality - <http://www.buildingcommunity.org.uk/> and <http://www.planninghelp.org.uk/>
- Historic England - Improving your neighbourhood

- The Prince's Foundation for Building Community
- Campaign to Protect Rural England (CPRE) in partnership with National Association of Local Councils (NALC)

### **Community right to Build Organisations/Orders**

**4.8** Community Right to Build Orders can grant planning permission for new, small scale development on specific sites. Separate requirements are given in the Regulations for the conditions an organisation has to meet to be regarded as a community right to build organisation, and do not have to be approved by the Council. Community Right to Build Orders can provide planning permission for a specific development proposal of community benefit, including new housing, without the need to make a separate planning application. To progress an Order, the proposal has to be in an area which has been designated by the Council as a 'neighbourhood area' and a referendum must take place. There are currently no Community Right to Build Orders proposed or in place in Wandsworth, but in line with the Council's commitments to progress community participation and support the government's localism agenda, the Planning Service is committed to provide support and assistance.

**4.9** To ensure that community participation, engagement and publicity arrangements meet the Regulations, the Council will expect that this will be extensive within the locality to maximise community engagement by capturing representations from a broad spectrum of the local area's population and workers/businesses. The Council will aim to bring applications for neighbourhood forum and area applications, or draft neighbourhood plans to the attention of as many people as possible in a locality and publicise widely the details of how to make representations. The following methods are considered proportionate and appropriate for any future neighbourhood planning publicity that will arise during the period of this SCI:

- Publicise on the Council's website;
- Publish a notice in the local newspaper;
- Street notices to be displayed in prominent locations within the proposed neighbourhood area;
- Use of the Council's Twitter and Facebook to publicise a forthcoming consultation to maximise participation levels.
- Arrange for a press notice of the application and details of consultation also to be published in the Council's E-newsletter and Brightside online (the Council's magazine with a circulation of around 50,000 homes)
- Publicise notification of neighbourhood planning consultations in 'Streetlife' - this is a social network for local communities, which aims to help people connect with their neighbours and share practical information, advice and resources. The Council automatically connects people signing up with the Streetlife users in their local area, and keeps users posted on the discussions happening in their local area.

- Where the GDPR regulations allow, the Council will aim to use the Planning Service's Local Plan database of people and organisations for neighbourhood planning publicity purposes which help target residents and appropriate organisations and community groups who had expressed a previous interest in planning consultations for example.

### **Community Infrastructure Levy (CIL)**

**4.10** The Community Infrastructure Levy (CIL) legislation allows local authorities to set charges which developers must pay when bringing forward new development in order to contribute to the delivery of infrastructure to support development. Wandsworth has an adopted charging schedule which sets out the tariff for different types of development across the Borough. The Borough CIL Charging Schedule and Instalments Policy first came into effect in 2012.

**4.11** The Council is committed to reviewing every 3 years to determine whether the Charging Schedule needs to be revised. The first review was undertaken in 2016 and confirmed that the adopted CIL rates continue to reflect the amount of funding needed to provide infrastructure necessary to support development in the Borough, without adversely impacting viability. A subsequent review is due to take place in late 2019 and if it is identified that a full or partial review of the Charging Schedule is required, consultation will be carried out in accordance with the CIL Regulations 2010 (as amended) which currently include inviting representations from statutory organisations, residents and businesses in the Borough.

**4.12** The Council is currently required to publish a list of infrastructure to be funded by CIL, known as the 'Regulation 123' list and to publish reports on the amount of Borough CIL collected and spent for each financial year before the 31 December following the end of the relevant financial year. Following a recent Government consultation on reforming developer contributions, it is anticipated that forthcoming changes to the CIL Regulations will alter requirements in relation to consultation and publication of information.

### **Wandsworth Local Fund (WLF)**

**4.13** The Council is required to spend a proportion of the Borough's CIL receipts on local priorities, taking account of the views of the residents in the neighbourhood where the receipts were generated. This is the neighbourhood portion of CIL called the Wandsworth Local Fund. In areas without an adopted neighbourhood plan, 15% of CIL receipts are allocated to neighbourhood CIL. The neighbourhood contribution of the Community Infrastructure Levy (CIL) is known as the Wandsworth Local Fund (WLF). CIL is a charge primarily on new developments, to pay for community and social infrastructure needed to support the resulting growth in new homes and commercial developments. For example, this might be new or safer roads, park improvements or a new health centre. Changes under the Localism Act have enabled residents to influence how the 15 per cent local proportion of CIL can be spent; this must be on projects that



take into account the views of the neighbourhood where the new development has been built. In areas with an adopted neighbourhood plan the local element increases to 25% of CIL receipts, and a neighbourhood forum would be included in the Council's consultation on setting priorities for that neighbourhood. The Council will meet the consultation requirements for allocating the spending to be prioritised by the local neighbourhood through appropriate methods taking account of the consultation principles set out in chapter 2, for example carrying out a survey to determine local priorities and/or through publicity on the website.

**4.14** To assist the community and ward Councillors to successfully nominate suitable schemes the Council has provided guidance and information on its website. Further to this the Council undertook a Borough-wide consultation in 2014 to establish residents' priorities for spending the WLF and this has been repeated in June 2018. The results of the consultation will be submitted to the Planning and Transport Overview and Scrutiny Committee and will be publicised on the website and aligned with the application process in due course.

**4.15** Five waves of projects have been approved so far and are carried out on a regular basis, and the latest round (Wave 6) of the WLF being open to applications in summer 2018. The amount of WLF collected by the Council is expected to continue to increase over the next few years, allowing the local community to continue to nominate suitable projects in their neighbourhood. The outcome of the latest round of consultation on local spending priorities will be announced later in 2018

The Wandsworth Local Fund Neighbourhoods are:

- Balham
- Battersea
- Putney
- Nine Elms
- Tooting
- Wandsworth

**4.16** Nine Elms Vauxhall is one of the biggest regeneration areas in Europe and will eventually form a brand new neighbourhood from what was once a low density industrial area. This means that the Nine Elms Local Fund for this area is required to fund the wider redevelopment programme being undertaken and, at present, is therefore not available for the submission of bids.

**4.17** More information on CIL can be viewed on the Planning Portal website, and the Council's website provides extensive advice and information on CIL, CIL area boundaries, neighbourhood CIL and the Wandsworth Local Fund, past projects and notification of future project submission dates can be viewed here: [www.wandsworth.gov.uk/cil](http://www.wandsworth.gov.uk/cil)

## 5 Consulting the Community on Planning Applications

**5.1** The Council has long-established and successful methods of dealing with, and consulting on planning applications, usually going beyond the minimum legislative requirements for public engagement and/or publicity. These methods are still considered robust and relevant and the overall approach therefore will continue to form the basis for future consultations. The Planning Service will continue to regularly monitor and review the effectiveness and resource-efficiency of public involvement and consultation in Development Management, primarily on planning applications but including appeals and development in conservation areas. As set out in chapter 2, this update takes account of best practice and the Council-wide approach to public engagement setting out broad principles, seeking best value, and meeting statutory requirements, so that the SCI can continue to provide a transparent and consistent framework even if changes in legislation mean that some of the consultation arrangements set out here may no longer apply during the lifetime of this document.

### **Pre-application discussions**

**5.2** The NPPF (2018) advises that 'Early engagement has significant potential to improve the efficiency and effectiveness of the planning application system for all parties' (para 39). The Council is keen to encourage developers to discuss their proposals with planning officers before submitting an application. This can confirm whether the principle of development is acceptable and clarify the format, type and level of detail required to enable us to determine an application. Pre-application advice is currently provided on request and the procedure for arranging pre-application advice and a schedule setting out the charges for different types of advice is available on the planning website. Developers are actively encouraged to make pre-application contact, and the opportunity is taken at that stage to indicate the full range of supporting material that should accompany an application. This information will vary according to the nature of the scheme but might, for example, include a statement explaining the approach taken to design, etc. and outlining draft planning obligations. Full details of the type of supporting documents by application type can be found on the Council's website under 'Planning Application Requirements'.

### **Pre-application consultation**

**5.3** Developers are encouraged to consult neighbours and/or local amenity bodies before submitting an application, and some already carry out some promotional publicity. The Localism Act (2011) sets out requirements for pre-application consultation and the NPPF also encourages applicants who are not already required to do so by law to engage with the local community before submitting an application. The Council cannot insist on a pre-application consultation. However, developers of major applications are advised to consider carrying out or commissioning a structured form of consultation at this stage, based on officer advice about whom the Council is likely to consult. Developers

will then be able to submit a consultation statement with the application, setting out who has been consulted and how, responses that were received and changes to the scheme that were made as a result.

### **Publicising planning applications**

**5.4** A weekly list of applications is published on the website, and emailed to Councillors and on request to members of the public by email. The weekly list and a list of applications advertised in the local newspaper are also available online. While it is still a legislative requirement, the Council will continue to advertise relevant applications in the local press including major planning applications, those affecting sites in conservation areas, listed buildings and significant departures from adopted Local Plan policy. Public notices are also placed on the website.

**5.5** Individual consultation letters are sent to those neighbours considered likely to be affected by a proposal. Consultees will normally have at least 21 days to comment. Notices are published in the local paper and/or displayed on or close to the site (for at least 21 days) for many applications, including those which would affect the character or setting of a listed building, or the character of a conservation area, or which in the Council's opinion are likely to have implications for more than the immediate neighbours. In the case of applications accompanied by an Environmental Statement consultation is extended to 30 days. The Council will encourage applicants to hold an exhibition and/or a public meeting may be appropriate in some cases. The scale and extent of consultations will reflect the likely impact of a development. This will range from individual neighbours for householder applications up to newsletters for major schemes. For further detail on how the scale and nature of an application affects the consultation please see the table in Appendix 3: 'Community Involvement in Planning Applications'.

**5.6** Where appropriate we seek the views of other organisations (some as a legal requirement) such as Historic England and the Environment Agency, as well as advisory groups such as local amenity societies and residents' associations. Bodies such as Natural England will be allowed a longer period of time to comment on applications where this is prescribed by legislation as in the case of applications accompanied by an Environmental Statement for example.

**5.7** The Wandsworth (Conservation Area) Advisory Committee is consulted on important applications affecting heritage assets or their setting, such as conservation areas, listed buildings and locally listed buildings. Applications for demolition in a conservation area (Relevant Demolition) and Listed Building Consent applications will be publicised through site and press notices placed. Information on advertisements is also placed on the website. Significant applications will normally be accompanied by a full planning application upon which the appropriate scale of neighbour consultation will be undertaken. Public participation also takes place via Wandsworth's Design Review

Panel. This comprises a panel of independent professionals with architectural and design expertise consisting of a Chair and five other built environment and design professionals who have requested to be involved and are then selected from a pool.

**5.8** Architects and designers will be invited to submit their proposed scheme for a review. This will involve preparing drawings, models, PowerPoint presentations and other media formats for a presentation before the panel. Panel members will then ask questions to the design team to clarify any issues and discuss the design of the scheme. The Chair of the Design Review Panel will co-ordinate the panel discussion and will lead the response. A formal report will be sent from the Design Review Panel to the developer and their design team.

**5.9** The types of schemes that the panel will be invited to review will normally comprise large scale Riverside developments and town centre schemes. These will comprise schemes covered by the Site Specific Allocations Document (SSAD); Sites of 50 residential units and above; other development of floorspace greater than 5,000 square metres and significant public realm schemes that involve creation of new or alterations to existing public spaces and streets.

**5.10** Neighbouring councils are consulted where planning applications are judged to potentially have an affect beyond the Borough boundary, but the Council also consults directly occupiers of properties in other boroughs that adjoin the application site. Where the Council's views are sought on schemes in adjoining boroughs, appropriate consultation with statutory bodies, other departments and the community will be carried out as necessary and reported to the Planning Applications Committee in line with the current Scheme of Delegation for consideration as to whether objections are to be raised.

**5.11** People can request to be automatically consulted by e-mail on applications in their area or any part of the Borough they are interested in and currently over 900 have taken advantage of this service. Details of applications can be found on the Council's website by searching by address, application number, postcode or using the GIS public interface (website) Wandsworth Mapping information. This enables 'self-service' and 24 hours access to key information in line with the corporate approach to accessing Council services.

**5.12** The Council publishes its Statutory Register of planning applications online at [www.wandsworth.gov.uk/planning](http://www.wandsworth.gov.uk/planning). The Register includes forms, plans, drawings and reports accompanying the application and decision notices. Any comments received also form part of the Register and are made publicly viewable online until an application is determined. Different documents are viewable at different times in the life of the application following guidance agreed by the Information Commissioners Office. The electronic version of planning application documents can be viewed at the Customer Services Centre during office hours without an appointment. Applications and associated documents can also be viewed on the internet. Access to the internet is available free

in the Borough's libraries. Consultation letters give the name and contact details of the planner dealing with the case, who can be contacted for further information on the application.

**5.13** The Council's practice is to negotiate improvements to applications. In some circumstances we will re-consult (usually for 14 days) on amendments if we consider that they raise new issues which could lead to further comment.

**5.14** Legislation prescribes that schemes of potentially significant importance require the Mayor to be consulted in his role of making strategic planning decisions for London. The Mayor may take over the determination of an application therefore becoming the local planning authority. In such cases all representations made against the application are forwarded to the Mayor and a public hearing must then be held before deciding whether or not to grant permission. Notification of the date of the hearing will be given in the form of a site notice 7 days before the event. Members of the public can attend the meeting and persons who have already made representations on the proposal may speak at the meeting by prior arrangement.

### **Prior approvals and Permission in Principle (PIP)**

**5.15** Prior approval is a light-touch process which applies where the principle of the development has already been established, but where a developer has to seek approval from the Council that specified elements of the development are acceptable before work can proceed. Publicity and/or consultation for these types of applications will be carried out in accordance with the relevant legislation. For prior approvals this usually takes the form of letters to adjoining owners or occupiers immediately adjoining the site or in the form of a site notice. The permission in principle (PIP) is an alternative way of obtaining planning permission for housing-led development which separates the consideration of matters of principle for proposed development from the technical detail of the development. The permission in principle consent route has 2 stages: the first stage (or permission in principle stage) establishes whether a site is suitable in-principle and the second ('technical details consent') stage is when the detailed development proposals are assessed.

**5.16** Non-residential development may also be given permission in principle providing housing occupies the majority of the floorspace of the overall scheme. PIP consultation requirements are set out in legislation, namely the Town and Country Planning (Brownfield Land Register) Regulations 2017 for suitable sites on brownfield registers, and in the Town and Country Planning (Permission in Principle) Order 2017 (as amended) when permission in principle is sought by application. In both situations, the Council is required to consult bodies identified in legislation (in Schedule 4 to the Town and Country Planning (Development Management Procedure) (England) Order 2015) if it is judged that the land within the site falls within the prescribed category, and take in to account any responses received. There are also requirements for consulting the Mayor of London.

## **How to comment**

**5.17** Comments may be made by anyone, regardless of whether they were consulted individually. Comments are welcomed, whether in support of an application or objecting to it, although the Council can only take account of those which are 'planning considerations'. These include matters like the effect on traffic or parking, the appearance of the proposal, overlooking or disturbance, loss of light or privacy, impact on the local environment and whether the proposed use is suitable. 'Planning Considerations' do not include matters such as loss of property value, private disputes between neighbours, matters covered by leases or covenants, the impact of construction work, and competition between firms.

**5.18** Comments should be submitted within the timeframe set out in the consultation publicity/notification, although the Council takes into account any representations received up to the date it makes a decision. Comments should be made in writing, by individual letter or petition, wherever possible. The Council encourages comments to be made directly on the website or by e-mail. Comments received by email or through the website will automatically be acknowledged electronically. There will be no acknowledgement to letters, however all comments will be available for public viewing within 3 working days of receipt. A planner is available on request to answer householder enquiries at the planning offices and a duty planner is also available to give general advice over the phone. This is particularly beneficial for those traditionally 'Hard to Reach' members of the public including those without access to a computer.

## **Transparency and taking views into account**

**5.19** Many decisions have been delegated to officers by elected members, but if the application is to be decided by the Planning Applications Committee any planning comments are drawn to their attention before a decision is made. The Committee's agendas are published on the website 5 clear working days in advance. A copy of the agenda front sheet listing reports to be considered is sent to all libraries, where the remaining documentation can be viewed on line there, and a paper copy is also made available at the Town Hall. The meetings are held in public and Councillors can be approached beforehand to make representations to the committee on behalf of applicants or objectors. Ward councillors may also be willing to put constituents' points of view to the Committee, and it is their responsibility to declare where they have a personal interest and exclude themselves from decision making on a particular application.

## **Letting people know the outcome**

**5.20** It is not possible to respond individually to comments; the decision notice is available for public view on the Council's website. The decision notice will show any conditions that may have been placed on permission. Only the applicant can appeal against the decision but if an appeal is made, public consultation will be carried out in accordance with statutory requirements with consultees on the original application

being notified together with details of how the appeal will be determined. This may take the form of a hearing or public inquiry where members of the public would be able to attend. Depending on the type of application that is being appealed against, there may be the opportunity of making further representations to the Planning Inspectorate who deal with the appeal. Any comments made against the original application are forwarded to the Planning Inspectorate for consideration as part of the appeal process. Lists of decisions, appeals, and building control decisions are published and a register of planning decisions can be inspected on the website.

### **National Infrastructure Projects – consultation**

**5.21** The Planning Act 2008 process was introduced to streamline the decision-making process for major infrastructure projects, making it fairer and faster for communities and applicants alike. The Council currently has one Nationally Significant Infrastructure project it is involved with which is the Thames Tideway Tunnel project, and which came into effect on 24th September 2014. Whilst the Thames Tideway Tunnel Ltd (TTT) project team is responsible for community engagement and consultation, the Council will continue to attend and participate in the three community liaison groups for the project within Wandsworth. The Local Planning Authority is required to determine a number of planning applications submitted by Thames Water Utilities Limited in relation to the Order. These applications are for discharging the requirements of the Order, as the principle of development has already been approved after public examination. The Council is not obliged to consult, however in the interests of promoting transparency and where the Council considers it is appropriate and proportionate to the actual requirement being discharged, it will carry out consultation with the public by sending out a consultation letter to properties that adjoin the site, and to other properties in the area that might reasonably be considered to be affected by the development, as well as making the application available on line. The TTT website is kept up to date so that residents and stakeholders can view full details of the progress for each of the worksites and the project overall. It also posts details of all minutes/notes for previous public meetings and provides details for future meetings. The Northern Line Extension to the London Underground network is being progressed under the Transport and Works Act; however the Planning Service administers and consults on applications for the discharge of conditions, with the degree of publicity being proportionate to the application.

## 6 Monitoring and review

### Reviewing the Statement of Community Involvement

**6.1** All local planning authorities are required under section 18 (1) of the Planning and Compulsory Purchase Act 2004, to produce a Statement of Community Involvement (SCI) and to keep it up to date and reviewed every 5 years and reasons must also be published if a local planning authority decides not to review the document. A review may also be triggered by material changes in primary legislation, planning regulations or government advice affecting public consultation requirements.

**6.2** The first Wandsworth SCI was adopted in 2007 and was last revised in 2012. Since then there have been a number of changes in planning legislation and changes in current practices in community engagement, permitted development, changes to delegated powers in determining planning applications, neighbourhood planning, adoption of the Wandsworth CIL and local spending of CIL receipts. Other changes include greater use of electronic communications and social media and are reflected in this SCI review. This review also takes account of the revised National Planning Policy Framework (2018) which identifies the need to consider efficient uses of resource in plan-making, promotes joint working and cooperation with neighbouring councils and advocates greater use of electronic communications in community engagement. The latter includes emailing rather than sending paper copies of consultation letters, using social media and the Council's website to publicise planning applications and Local Plan consultations and the ability to make comments directly to the Council electronically. This method can also both increase participation rates and broaden the range of the population that engage with the Council on planning matters.

### Monitoring the effectiveness of engagement

**6.3** Regular engagement with residents and stakeholders can also take place through receiving feedback on the Planning Service, and complaints, comments or suggestions can be made online. These can also be made in person at the town hall customer centre by completing a comment card; to a member staff or with one of the public reception managers. The Council's complaints procedure is also published online and there is a target to respond to complaints is 10 working days. Liaison with the Council's corporate Community Engagement officers, Corporate Communications team and Equalities Officer can help the Planning Service to understand the effectiveness of engagement methods through customer feedback and to receive advice on any Council-wide best practice or improvements to consultation methods or effectiveness. In addition, at all times customer feedback on carrying out planning consultations and how the planning process is operated is encouraged. There is a dedicated page on the Council's website for customer suggestions, feedback and complaints: <http://www.wandsworth.gov.uk/complaints>



## Resources and Best Value

**6.4** Wandsworth continues to receive less funding from Central Government, therefore this SCI update aims to reflect a continuous need to explore opportunities to find more effective ways to engage with the public, whilst maintaining the principles of best use of scarce resources. It is expected that the public consultation commitments in this Statement of Community Involvement are capable of being resourced from within existing budgets based on the current resources available to the Planning Service, but we will aim to use the most cost effective methods of consultation in future. The Shared Staffing Arrangement with Richmond-upon-Thames Council may offer further savings and/or streamlined processes during the lifetime of this SCI and it is hoped that the Wandsworth Planning Service can continue to involve the public in decision making beyond the statutory minimum requirements set out in the planning legislation, whilst being as cost effective as possible.

### Sources of Further Information and advice:

**Online:** The Council's website this includes information and advice on planning applications, planning history and general planning advice for householders, plan-making, neighbourhood planning, CIL and information on public consultations. The website has been developed to offer a self-help user-friendly interface which facilitates online consultations and provides key information such as the local Plan and Policies Map in a downloadable form: [www.wandsworth.gov.uk](http://www.wandsworth.gov.uk)

**The Planning Portal:** This is the Government's online planning and Building Regulations resource which provides information on plans, appeals, applications, contact details and research areas: [www.planningportal.gov.uk](http://www.planningportal.gov.uk)

**Planning Aid:** This is a charity offering free, independent, professional advice on planning issues: <http://www.rtpi.org.uk/planning-aid/>

**Royal Town Planning Institute (RTPI):** The RTPI provides advice for the benefit of the public: [www.rtpi.org.uk](http://www.rtpi.org.uk)

**Community Planning website:** Provides a range of advice and information to assist community involvement in planning and place-shaping: [www.communityplanning.net](http://www.communityplanning.net)

**Locality Neighbourhood Planning website:** <https://locality.org.uk> This provides information and support on all aspects of neighbourhood planning.

**In person:** You can make an appointment to see a duty planner by telephoning 0208 871 7620.

## Appendix 1 Who we should consult

The Government requires us to consult “specific consultation bodies” and other interest groups which cover the whole range of voluntary, community, special interest, amenity and business interests, referred to as “general consultation bodies”. The following lists also relate to successor bodies where reorganisation has occurred.

### Specific Consultation Bodies:

The Town and Country Planning (Local Planning) (England) Regulations 2012 define the following bodies as ‘specific consultation bodies’:

The Coal Authority

The Environment Agency

Historic England (Historic Buildings and Monuments Commission for England)

Marine Management Organisation

Natural England

Network Rail Infrastructure Limited

The Highways Agency

Adjoining Local Planning Authorities

Relevant telecommunications companies

Wandsworth Public Health Relevant

Electricity and gas companies

Thames Water

The Mayor of London (including the designated housing function and Transport for London)

### Strategic Environmental Assessment (SEA) Statutory Consultation Bodies

The Council will consult as a minimum the following bodies on the Scope of Sustainability Appraisals:

The Environment Agency

Natural England

Historic England

### General Consultation Bodies

The Government has defined General Consultation Bodies as voluntary bodies some or all of whose activities benefit any part of the authority’s area and other bodies who represent, in the authority’s area, the interests of different racial, ethnic or national groups; different religious groups; disabled persons; and, business interests.

The Planning Policy’s own consultation database contains over 1,000 groups, organisations and companies from the following categories:

Adjoining boroughs

Advice and information groups

Amenity groups

Architects, planners and other professionals  
Builders  
Community groups  
Conservation and heritage groups  
Developers  
Education/children/young people's group  
Older person's groups  
Employment/business interests  
Environmental groups  
BAME groups  
'Friends of' and amenity groups  
Health organisations  
House builders  
Housing associations  
Police and other emergency services  
Political parties  
Regeneration groups and partnerships  
Religious groups  
Residents and tenants groups  
River and Riverside interest group (including the Port of London Authority)  
Shopkeepers  
Sport and leisure groups  
Statutory consultees  
Town centre partnerships  
Transport groups  
Utility companies

**6.5** A database containing contact details of groups and individuals in the list above was created at the start of the initial Local Plan process and has since been continually updated as consultations have taken place. The database is linked to our online consultation portal and also contains comments and representations made on previous planning policy consultations. The database is open for any group or individual to register and receive notifications of future Local Plan consultation events

### **How to be included in a future consultation**

To be included in future consultations on planning policy, email your details to [planningpolicy@wandsworth.gov.uk](mailto:planningpolicy@wandsworth.gov.uk).

## Appendix 2 Consultation methods for Local Plan making

Method	Main consideration and benefit
Documents available for inspection at Wandsworth Town Hall and at main libraries in the Borough: Balham Battersea, Putney Tooting and Wandsworth.	This is a minimum requirement as set out in the Regulations (The Town and Country Planning (Local Planning) (England) Regulations 2012). The availability of these documents will be advertised by a variety of ways, including by letter, web-site and e-mail. All locations are accessible to people with disabilities.
Letters/emails to specific consultation bodies, as listed in the Regulations.	This is a minimum requirement. The relevant bodies will be notified at the appropriate time during the preparation of each LDD.
Email	<p>Many people have chosen to receive consultations on planning applications in their locality by email. It has been a popular method of communication so far in Local Plan consultations with the majority of responses being received electronically. Email is a quick and accurate way of communicating with the public and key stakeholders. The Local Plan database contains the details of all consultees and is regularly updated as consultation events take place.</p> <p>As email is the preferred means of consulting, we will not send notifications by post where a valid mail address is held. Wherever possible the Council will use email for consultation in to using hard copies of documents and letters.</p>
Printed media- local press, Brightside (Council newspaper), leaflets and newsletters.	Brightside is distributed to all homes and businesses in the Borough several times a year. Brightside -printed media - local press, leaflets and newsletters are a particularly effective method of reporting on the progress of major planning applications and is used for regular updates on the Local Plan. We will endeavour to use Brightside to inform residents and raise awareness of the process and progress of relevant planning issues, however as Brightside is no longer published on a monthly basis it will not be possible to publicise every stage in the development of Local Plan documents using this method.
Meeting with selected stakeholders and key interest groups	<p>This is a useful means of identifying key issues, getting people involved and achieving alignments with other strategies and initiatives.</p> <p>The Council will engage with amenity groups, the Town Centre Partnerships and Wandsworth Business Forum as appropriate.</p>
The Wandsworth Planning Forum - comprises representatives of local amenity and residents groups	The existing forum meets at least annually and is a useful forum for discussing Borough-wide and local issues and options and raising awareness of the Local Plan process. It

	provides the opportunity to explore issues in depth and may lead to follow up meetings. It is not used for the discussion of individual planning applications.
Questionnaires	Questionnaires may form the best way of gauging public opinions on specific issues. For example the prioritisation of the spending of neighbourhood CIL (Wandsworth Local Fund )spending
Digital communications	Use of social media such as Twitter is a useful tool to publicise live consultations, further use of online consultation methods, questionnaires and a mobile-enabled website will also continue to be used to provide 24 hour access to planning services outside of normal office hours.

### Appendix 3 Consultation methods for planning applications

Approach	All applications	Applications where the development may be of wider interest (i.e. mini-cab, bars or restaurants)	Applications which might affect the character, appearance or setting of a Heritage Asset*	Major developments (see definition below)	Particularly large or significant development, or departures from the development plan
Consultation letter to all properties that adjoin the application site and to other properties in the area that are judged to be affected by the development (e.g. properties on the other side of the street).	X	X	X	X	
Weekly list of planning applications	X	X	X	X	X
Electronic notification to residents, groups and businesses who have arranged to receive e-notification of all applications with a specific area	X	X	X	X	X
Website	X	X	X	X	X
Site notice		Discretionary	X	X	X
Advert in local press			X	X	X
Library or site displays					X
Public meetings (as appropriate)					Discretionary
Article in Brightside, the Council newspaper distributed to all homes and businesses in the Borough (where possible)					X

Consultation with local groups, including residents and tenants groups and amenity societies		X	X	X	X
Consultation with Wandsworth Conservation Area Advisory Committee			X		
<b>* Conservation areas, listed buildings, locally listed buildings, historic parks or monuments</b>					

### Major Developments

- Residential development of 10 dwellings or more (11 for affordable housing)
- Residential development on sites of 0.5ha or more where no. of dwellings is not known
- Buildings of 1000sq ms or more
- Sites of 1 hectare or more
- Waste development
- Mineral working

For more information write to:

Planning Policy and Design  
Environment and Community Services  
Town Hall  
Wandsworth High Street  
London SW18 2PU

Telephone: (020) 8871 7620

Email: [planningpolicy@wandsworth.gov.uk](mailto:planningpolicy@wandsworth.gov.uk)

[www.wandsworth.gov.uk/planning](http://www.wandsworth.gov.uk/planning)

If you need this document in an alternative format  
please call (020) 8871 7620