

Statement of Community Involvement for Lewes District

Response from Newick Parish Council

Questionnaire

Please leave your comments on the Statement of Community Involvement

1 Section 2 describes Plan Making, Neighbourhood Planning, Supplementary Planning Documents, and Development Management.

Does this section help you to understand how the planning system works in Lewes District?

This is a long section which provides a wide overview of planning as well as more detailed information. But, for many readers, it will be a challenge to progress through the various sections and have a working knowledge of how the planning system works in practice.

On page 4 you outline your intentions that are, 'inclusive, fair, and equitable, ensuring communities and stakeholders feel listened to and valued', this document and section most definitely does not meet this aspiration. For example, Fig.1 is written with an expectation that somebody already has an understanding of the process of planning and is presented as if a person can navigate a complex process. Fig 2 + 3 are even more complex and are very 'local government' narrative heavy. An example from Fig 3 says under point 2 - "Request Screening Option on SEA etc. from Council. Prepare draft NDO / CRtBO".

If the intention is to provide clarity and understanding, then these flow charts miss the mark.

A simple flow chart using simple English summaries would make this a much better document. One that would hopefully allow better feedback from participants.

It is interesting to speculate on just how much co-design and co-production was used to produce this document. It is tempting to come to a conclusion, not much, and yet simply using 'digital technologies' (which is also one of the intentions) such as AI would produce a clear and visually accessible document.

It would be helpful to have clearer sections included where the 'voice of the public' is recognised rather than having a document that appears on one level to have been produced 'in house' and yet knows very little about the District, as NPC finds very little in this document that is useful.

Overall, this section is too complex and not sufficient insight has been given to the 'lay reader'

Newick Parish Council (NPC) has a clear understanding of the processes involved in both long-term strategic planning, such as the emerging revised Lewes Local Plan and our own Newick Neighbourhood Plan (NNP) and the planning application process which is continuous and yet we have difficulty recognising something that we do on a monthly basis in this document!

This section and indeed the whole document lacks clarity in what it is referring to!

2 Section 3 explains how the Lewes District Council will involve the community in plan-making, including who will be consulted, when consultation will take place, and the methods used.

Do you think the proposed approach to community involvement in plan-making is sufficient?

The aims of the Council to engage with various members of the public are laudable and the wide suggestion of ideas that are provided in this section are balanced and appropriate for the social, age and distribution of people in the Lewes area. A wide voice of opinion from the public is essential to better promote planning.

On page 20, there is a statement that 'early engagement, on an informal basis may take place with the Council approaching organisations and consultation bodies for their input'. But there is less certainty that early engagement is going to be expected with local communities at this stage. That is disappointing. Engagement with local communities should be well established before larger organisations become involved, or at least, at the same time.

In person events, feedback groups and outreach to under-represented groups should be a hallmark of LDC. And, with the increasing development of digital communication, this important area especially for younger ages should be mandatory. It will be helpful to better understand how this will be developed and the resources provided for such a wide consultation.

3 Section 4 explains how the Lewes District Council will support Neighbourhood Planning and the role of communities in preparing neighbourhood plans.

Do you think the level of support offered for neighbourhood planning is sufficient?

The support that has been proposed seems appropriate for the tasks. However, there will need to be clear and supportive assistance from those leading the local groups. This is needed to provide a simplified and less complex structure and narrative. Those methods provided in the document are a good starting point but simple English documents and understanding is needed. There are further comments on this in the final section.

The list on page 36, detailing relevant planning issues and areas that are not considered relevant are good examples of clear communications that can be used as guides to how communication with local groups should look.

However, for NPC who are the responders in this case, there is a huge omission which will apply to many other Parishes and Towns within the District. Our Neighbourhood Plan (NNP) is now not in date and needs to be reviewed! We were the first village to 'Make' our NNP in the District and County, however there were several others who quickly followed us and as that was in 2015, this fact probably applies to the majority! Where are the flow charts and explanations of what we have to do and what support is available? LDC will have the current situation as to how many don't have a plan still as this section applies to 2012 not 2026! There should be a whole section with a clear flow chart 'How to revise a 'not in date' neighbourhood plan'.

4 Section 5 explains how the public can engage with planning applications, including pre-application, application stage, and appeals.

Do you think the opportunities for community involvement in planning applications is sufficient?

This section is entitled COMMUNITY INVOLVEMENT IN DEVELOPMENT MANAGEMENT which like much of the document is not only inaccessible to the average lay reader it is also a mystery to NPC! It took further reading to realise that it is talking about the usual planning application process!

At present, the two main ways that residents know about a planning application are by a notification letter or a site notice. It is not expected that residents will routinely look at local newspaper entries or visit the Council website. NPC as with all Parishes and Towns within the District is sent a weekly list of new applications – surely this good practice should be in this document. However, on page 34 of this document it says that;

'Opportunities exist for the community and/or stakeholders to be informed and consulted on development proposals at each of the following stages:

- Pre-application consultation
- Planning applications
- Planning appeals

NPC has frequently asked to have knowledge of a pre-ap taking place and be involved but access to this has always been refused, saying that its confidential! Has the situation altered?

Some consideration could be made to inform parishioners of planning applications especially pre applications. This transparency would be greatly valued by residents as well as the Parish Council. For clarity, on p39 it is stated that planning meetings take place at County Hall. However, currently the planning meetings are advertised on the LDC website as being held in Newhaven.

One area to reinforce would be to provide clear and understandable dialogue to decisions. Current decision notices still are difficult to understand at times as they are written with a view to legal jargon.

In terms of public engagement at each stage, there could be clearer signposting in a public facing document.

5 Please provide any additional comments you have on the Draft Revised Statement of Community Involvement.

Although there are many aspects to the document where the narrative is clear, there are other areas that make the reading unnecessarily complicated and at times complex. Examples of this are as follows:

- *There are many long sentences, often 25 - 40 words long - which doesn't help a reader to grasp and potentially understand the process of planning. As this is a document that LDC would ideally like to be accessible to a wide audience, this could give an unnecessary bias to feedback.*
- *There are other areas where too many technical terms are used. Examples of this are 'Development Plan Documents', Neighbourhood Planning Act', Regulation 18 consultations', Statutory Consultee's. Whilst there has been an attempt to clarify some technical terms, there is still a number of specialist planning and legal terminology that is present. The glossary in the final appendices was helpful, but difficult to navigate while reading sections of the document.*
- *There is a strong recommendation for public facing bodies to promote plain English, with an emphasis on a narrative that is not more demanding than a 9 - 11 reading age. Having reviewed this document, it appears written at a higher level, around 16 - 19 i.e. upper secondary school/adult level.*

Overall, as a Parish Council we are disappointed with the document as a whole. It could and should have been better drafted, and with input from the general population of LDC area rather than a document that feels written in house. If the aim of this type of document is to more accessible, then unfortunately, this is a retrograde step. We would expect and hope that our comments and suggestions would be taken as supportive criticisms and would be happy to input similar documents from their inception, rather than to comment at this late stage of development.