

SCIO4

LEIGH HOUSE 147 LEIGH ROAD
WIMBORNE DORSET BH21 3AD
T: 01202 639444 F: 01202 881868 W: WWW.LEVVEL.CO.UK

LEVVEL
INNOVATION IN HOUSING & PLANNING

Local Plans Section
Bromsgrove District Council
Burcot Lane
Bromsgrove
B60 1AA

24 August 2005

Dear Sir/Madam

Submission Statement of Community Involvement

In line with your Representation Form, Level Ltd are objecting to the following omission of a section or text in the following parts of the SCI: -

- 1 Fig 2 with regard to Stage 1 evidence gathering
- 2 Fig 5 with regard to methods of involvement
- 3 Fig 6 with regard to choosing the appropriate approach

We are supporting the following part of the SCI

- 4 Fig 7 What do we mean by 'Community'?

We have detailed the changes and reasons below why the SCI fails the following tests of soundness: -

- It identifies how the community and other bodies can be involved in a timely and accessible manner.
- The methods of consultation to be employed are suitable for the intended audience and for the different stages in the preparation of LDDs.

1. Fig 2 - Stage 1: Evidence gathering

You mention work has "already been carried out for major evidence gathering studies on issues such as housing" (p8). However the SCI does not stipulate what was carried out, when and how. The evidence base must be full and robust and we consider it to be a vital element for all development plan documents.



Members of the development industry are considered to hold valuable information relating to the local housing and commercial property market which local authorities would benefit from drawing upon to help inform the local evidence base. Failure to take into consideration such evidence would risk authorities making policy decisions without ensuring a full understanding of local issues and needs and could call into question the soundness of the development plan document.

Levvel is concerned that whilst many local community groups and other bodies are cited, it is not clear how the development industry in particular will be involved in the development of the evidence base.

2. Fig 5 Methods of Involvement

Levvel supports the use of Focus Groups & Workshops. However it does not clarify who will be involved in these groups and in particular the use of stakeholders within the Focus Groups.

Levvel would like the council to identify Developers, Landowners and House builders as a focus group and clearly state their purpose.

When consulting developers, it is important to ensure that the method of consultation is appropriate. For example, developers are able to give more considered answers to specific questions such as "what do you believe would be the effect of such a policy?" or "what measures could mitigate the specified adverse effects of a particular approach?"

Focus groups and Workshop sessions should discuss specific issues and should seek to be quantitative wherever possible. Specifically we are looking for the Council to be more proactive in involving developers, house builders, landowners and planning agents with a local interest, in the consultation on the LDF. Based on our experience within other authorities these organisations can be targeted through local planning authority's records of previous representations and recent planning applications, they can then be added to the consultation database.



3. Fig 6 Choosing the appropriate approach

We are concerned that the council is not using Workshops and Focus Groups in Stage 1 of DPDs and SPDs.

From our experience there is a risk that the development industry are not yet fully appreciative of the change in emphasis to a front loaded consultation process and as such could fail to be involved in the options appraisal and core strategy elements of the new process. It is considered to be critical that the development industry is specifically cited in an attempt to ensure those developers with a local interest are given the opportunity to understand local authorities policy objectives and have the opportunity for their views to be given due consideration at all stages of LDF process. In turn this could have the benefit of reducing the potential for conflict later in the planning process.

4. Fig 7 What do we mean by 'Community'?

The table on page 19 sets out under "Communities of Place" those who have an interest in a specific geographical area and have identified Landowners. Also under "Communities of Interest" Housing Groups and the Development Industry are listed. We commend the council for highlighting these key groups and subject to our responses above, working with the industry at each stage of the LDD's.

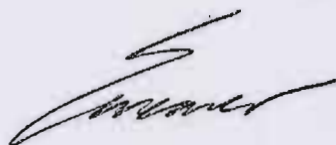
In Summary

We would like the SCI to be amended in the following sections: -

- Ensure that the development industry are involved in Stage 1 of evidence gathering (Fig 2)
- Members of the development industry are specifically cited as a key group and listed in an appendix to the SCI. (Fig 5)
- The table on page 16 is amended to tick workshops and focus groups being involved in stage 1 (Fig 6)

I trust we will be included in further consultation on all stages of the LDF especially where housing and specifically affordable housing is an issue. If you have any queries about the issues raised in this letter please do not hesitate to contact either myself, or one of the Levvel team.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Liz Weaver', written in a cursive style.

Liz Weaver
Policy and Research Officer
For and on behalf of Level Ltd