



MINISTERIAL ADVISORY GROUP
FOR ARCHITECTURE AND THE BUILT
ENVIRONMENT FOR NORTHERN IRELAND

Antrim & Newtownabbey Borough Council Consultation: Draft Statement of Community Involvement

MAG Response

21 | 10 | 15

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Draft Statement of Community Involvement
Ministerial Advisory Group (MAG) Response**

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By email to:

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1.0 General

- 1.01 MAG was established in 2007 to advise the Minister for Culture, Arts and Leisure on the implementation of the Architecture and Built Environment Policy.
- 1.02 MAG welcomes the opportunity to comment on the Draft Statement of Community Involvement and congratulates the Council on the timely and well considered draft.
- 1.03 The structure and general contents of the Statement of Community Involvement are based on the relevant legislation to link community planning with the development plan and management processes.
- 1.04 Compliance with the legislation requires a formality and use of technical language which can be difficult for the public to understand or sympathise with. The Council's proposals to reduce jargon are therefore welcomed.

MAG RESPONSE

2.0 § 1.3 – 1.6 ‘Vision of Participation’

- 2.01 The use of language is an important part of engaging the customer. MAG welcomes Antrim and Newtownabbey Borough Council's statement on its ‘Vision of Participation’ which capsulates the values the Council that will apply to community involvement.
- 2.02 The draft Statement of Community Involvement is to be commended for using friendly and personal language, including “a commitment to placing our customer at the heart of everything we do and engaging with the public to understand their needs and exceed their expectations.”

3.0 § 1.7 ‘Principles of Community Involvement’

- 3.01 The section on ‘Principles of Community Involvement’ defines more precisely the elements considered in community involvement and is again to be commended for the clear and personal quality of the language. However, in line 2 of the introductory paragraph to 1.7, MAG suggests that ‘involvement’ should be substituted for ‘consultation’ because consultation is a relatively small part of continuing community involvement.
- 3.02 MAG believes that the Principles could be expanded as follows:
- **‘Culture of Engagement’** could describe some ‘customer-friendly’ actions that will be used to inform the public of the opportunities to be involved.
 - **‘Early Involvement’ and ‘Continuing Involvement’** could be expanded to encourage pre-planning development of public consciousness.
 - **‘Open, Transparent, Inclusive and Fit for Purpose’** could state that pre-planning engagement using workshops, literature etc. would be used to encourage initial involvement and identify the needs and experience of the community.

- **'Clarity'** could be expanded to say that the public is encouraged to participate and express views and ideas before the Development Plan process is begun.

3.03 MAG suggests the addition of the principle of 'Creativity' with suggested wording as noted below:

- **"Creativity**

We will actively encourage creative Involvement, using new ways of doing statutory consultation that will reflect the nature of the particular activity. We will design processes to both benefit from and contribute to best practice, using among other resources the interactive website designed for the Strategic Investment Board by the Ministerial Advisory Group for Architecture and the Built Environment." <http://toolkit.creativityni.org/>

4.0 § 2.2

4.01 This paragraph could describe the value of community involvement in preparing a spatial and implementation plan, integrating and including stewardship of places (which is highly involving of communities) and not emphasising zoning. It could make clear that community involvement will always be informed by sound planning principles and give examples of these, such as prioritising use of disused and underused places (including 'brownfield' land and property) within settlements, saving excessive sprawl, reducing transport needs and creating more vibrant places for people.

4.02 The paragraph could state:

- *"Our new LDP will be prepared within the context of the Council's Corporate Plan and will co-ordinate with the community planning process to enable us to plan positively for the future of our Borough. It will ensure that stewardship, design and planning of lands involve communities on a continuing basis, so that the plan is a true adjunct to community planning that is able to be realistically implemented. Community involvement will always be underpinned by sound planning principles that prioritise use of disused and underused places (including 'brownfield' land and property) within settlements, saving excessive sprawl, reducing transport needs, creating more vibrant places for people and ensuring that our*

infrastructure is enhanced to develop the Borough for future generations."

5.0 § 2.5

5.01 This paragraph could emphasise working closely with people in the preparation of the plan, and could be adjusted to read as below:

- *"Before the development plan documents are prepared we will work closely with people and groups who wish to get involved to identify key planning issues and opportunities, defining a range of options for addressing these. This will culminate in the publication of a Preferred Options Paper."*

6.0 § 2.6

6.01 This paragraph could be altered to emphasise the importance of placemaking and how it fits within the plan. It could read, for example:

- *"The Plan Strategy will define the strategic objectives for the future development of the Borough. It will include a range of strategic policies to facilitate and manage development and a spatial strategy that indicates in broad strategic terms the kinds of places that we have agreed we want to create in future, with reasons why different kinds of developments will be promoted or discouraged in specific locations."*

7.0 § 2.7

7.01 MAG suggests an emphasis on working together and working to an agreed Plan Strategy, the inclusion of stewardship methods and the use of words other than 'land use zonings' to reduce jargon. It could read, for example:

- *"Once the Plan Strategy is adopted, we will work together to prepare a Local Policies Plan. This will include site-specific proposals, policy designations, proposed stewardship methods and reasoned proposals for uses of land that will be required to implement our collective vision, objectives, spatial strategy and strategic policies that will be defined in our agreed Plan Strategy."*

8.0 § 2.9 'Who can get involved'

- 8.01 It is encouraging that the Council wants to involve the whole community and emphasises that the list is not intended to be exhaustive "and is not intended to restrict any individual, group, or organisation from participating in the plan making process."
- 8.02 MAG suggests that the wording be changed to emphasise that community involvement is more than "seeking views" – it is about trying things out together, seeking real evidence based on people actually doing things together and not just giving their views in artificial places in unrelated ways (which often happens when people are invited to "workshops" or "meetings").
- 8.03 The sentence could be changed from "In particular, and in addition to Elected Members, the views of the following groups of people will be sought:" to "In particular, and in addition to Elected Members, we expect that the following groups of people will be able to contribute actively and valuably to the work:".

9.0 § 2.10

- 9.01 This paragraph could include opportunities as well as concerns, perhaps reading:
- *"Elected Representatives, community groups and residents groups provide a voice for the local community. Other voluntary and interest groups also bring a special knowledge and can help to ensure that important local planning related opportunities and concerns are addressed."*

10.0 § 2.11

- 10.01 This paragraph could emphasise working together by saying:
- *"Together, we recognise that the actions of the business community and in particular developers are fundamental to implementing the policies and proposals which will shape development within our Borough."*

11.0 § 2.17

11.01 It is suggested that this paragraph could emphasise the importance of evidence being real and relevant, reading perhaps:

- *“We will collect data and analyse information to establish an evidence base to inform our decision making. This will be undertaken using topic-based and place-based approaches around each of the key planning issues. We recognise the importance of evidence being real and relevant. We will therefore invite evidence from everyone who wishes to be involved and work with people who wish to generate evidence by scientific method using, for example, experimental pilot studies. The compilation of evidence will also involve engaging with Elected Members, the public, key stakeholders, and key consultees. The initial findings from our evidence gathering will inform the preparation of our Preferred Options Paper.”*

11.02 Key consultees are required to co-operate in the plan making process. The Project Management team will be consulted on and act as the screening and scoping group for the Sustainability Appraisal of the Plan. It is particularly important that the council encourage consultees such as Transport NI to look beyond their engineering remit and engage in innovative transport solutions as part of the local Development Plan.

11.03 The concept of stewardship has now been embedded in supplementary planning guidance, Living Places, and in the Strategic Planning Policy Statement. Stewardship is already operational in many places, but communities and built environment professionals may need to specifically identify and encourage it. Stewardship can thereby be further developed early, easily and cheaply, be continuous and provide evidence to inform plan making and implementation. Stewardship is a great way to involve people and to allow them to see real results very quickly, encouraging further participation.

12.0 § 2.18

12.01 MAG suggests some additions so that the paragraphs would read as follows:

- *What we will do:*
 - a. *We will work together to produce a launch event and exhibition helping people to celebrate existing good local work in stewardship and design while noting places and practices that could bring greater public benefit, publish our timetable, and invite initial views about the Borough's strategic planning issues;*
 - b. *We will disseminate appropriate information, meet local groups and consider new ways of engaging with the local community and communities of special interests (for example continuing our 'Planning my Place' events for schools and learning by pilot studies of innovative and creative ways to use and appreciate our existing talents and places);*
 - c. *We will set up a Steering Group comprising nominated members of the Planning Committee, the Chief Executive, the Director of Community Planning and Regeneration, and the Head of Planning. This is the high level co-ordinating body that will ensure oversight and strategic input on behalf of the whole community, as well as from planning and design professionals;*
 - f. *We will compile a list of all those who have expressed an interest in being informed about the key stages of the preparation of the Local Development Plan. The aim of the list is to ensure that those that have expressed an interest in planning in the Borough are kept involved in the plan making process. This list will be kept under review and all written requests for inclusion will be considered;*

13.0 § 2.19

13.01 This paragraph could be augmented by adding “in the public interest” so that it could read:

- *“The first formal stage in the preparation of our Local Development Plan will be the publication of a Preferred Options Paper (POP). This will set out the key planning issues in the Borough, identify a range of options available to address them and define our preferred options. It will promote debate on issues of strategic significance which are likely to influence the shape of future development. The POP will be subject to a period of public consultation and engagement which will seek to stimulate a wide-ranging, yet focused, debate and encourage feedback from a wide variety of interests. Any representations or views received as a consequence of its publication will be considered in the public interest whilst formulating our Draft Plan Strategy.”*

14.0 § 2.22

14.01 MAG suggests that planning officers could be available to listen carefully as well as answering questions so that the paragraph could be adjusted to read:

- *“c. We will hold public engagement events and exhibitions with drop-in sessions at locations throughout the Borough where our Planning Officers will be available to listen carefully and answer questions;”*

15.0 § 2.27

15.01 MAG suggests that planning officers could be available to listen carefully as well as answering questions so that the paragraph could be adjusted to read:

- *“c. We will hold public engagement events and exhibitions with drop-in sessions at locations throughout the Borough where our Planning Officers will be available to listen carefully and answer any questions;”*

16.0 Local Policies Plan – Adoption – § 2.32

16.01 MAG believes there may be a typographical error in this paragraph and wonders whether it should read:

- *“Following the Independent Examination, the Department of the Environment will issue a Direction to the Council, requiring us to adopt the draft Local Policies Plan as originally prepared or with modifications. We may also be directed to withdraw the draft Local Policies Plan. In either scenario, the Department will be expected to give reasons for its decisions.”*

17.0 Supplementary Planning Guidance – § 3.1

17.01 MAG suggests that the Council could be proactive with local community involvement early in preparing supplementary planning guidance. This paragraph could therefore state:

- *“The Council may also prepare non-statutory policy and planning guidance particularly to support its development plan. Supplementary planning guidance (SPG) includes for example design guides and advice notes. Consultation on SPG will take place in a proportionate manner where the Council feels it will be beneficial to give additional regard to the opinions of stakeholders and the general public. Any comments received will be presented to the Planning Committee. It is not necessary for SPG to go through the public examination process for consideration. Supplementary planning guidance does not need to wait for the Local Development Plan and can be initiated by local people or special interest groups to deal with specific local or borough-wide issues. We would welcome early and continuing community involvement in this process which can be implemented relatively quickly to assist the process of development management and to actively try new approaches that would inform the preparation of the Local Development Plan.”*

18.0 Conservation Area Designation

18.01 MAG would suggest that communities be made aware that the Council will take a proactive approach to conservation area designation and seek community involvement in this process. The paragraphs could therefore read:

- § 3.2 *“A conservation area is an area of special architectural or historic interest, the character of which it is desirable to preserve and enhance. The Council considers that consultation with, and the involvement of local people is important when undertaking work associated with Conservation Areas. This will help encourage greater ownership of the concept and greater co-operation and commitment to achieving the aims of the designation.*

§ 3.3 “The Council will involve the community in the designation, variation or cancellation of a Conservation Area, as well as any significant works proposed by the Council such as public realm schemes. This will entail formal consultation with the Historic Buildings Council and advertising by way of a public notice in the local press and public meetings to discuss and present proposals. For any new designations, the Council will publish a public notice in the local press and hold a public launch and exhibition.

§ 3.4 “The designation of Conservation Areas is a separate process which is independent of the preparation of the Local Development Plan although both processes can inform each other. Conservation Areas, particularly when supported by people who live and work in them, can transform the appreciation and stewardship of places, creating real public benefit without necessarily having to wait for the Local Development Plan. For this reason, we are particularly keen to hear from local people and organisations that may have proposals in respect of new or existing Conservation Areas and appropriate design guidance.”

19.0 PRE-APPLICATION STAGE Pre-Application Discussions (PADs) – § 4.9

19.01 In the interests of transparency and so that the council or developers cannot be accused of doing deals in private before applications have been submitted, MAG recommends that notifiable neighbours should be informed of PADs and invited to attend these discussions. The paragraph could be amended to reflect this:

- *“Pre-application discussions are encouraged for a range of applications, both major and local. The objective of pre-application discussions is to confirm whether the principle of development is likely to be acceptable and to clarify the format, type and level of detail required to enable the Council to determine an application. For major applications it will also enable the applicant to discuss how the local community should be involved in the decision-making process. In the interests of transparency, neighbours who would be statutorily notified of a planning application will be informed when PADs are to take place and invited to attend these discussions. This involves communities near the start of the process, appreciating local knowledge and common sense for the benefit of the prospective applicant and in the public interest. The views of the local public are thereby acknowledged at the earliest possible stage when they can contribute most, forming an efficient and effective part of community involvement to deal with issues and opportunities as early as possible, before nugatory work has been undertaken and time wasted.”*

20.0 § 4.14

20.01 MAG suggests a minor rewording as follows:

- *“We would strongly advise all applicants considering submitting major planning applications to seek a Pre-Application Discussion (PAD) with planning officers.”*

21.0 § 5.5

21.01 MAG suggests a minor rewording as follows:

- *“In cases where planning enforcement action is taken, complainants are informed of the action. In cases where enforcement action is not taken, a full explanation providing our reasons will be sent to those who have brought the matter to the attention of the Council. As well as larger developments or changes of use, complaints may relate to householder extensions, or alterations which often may not require planning permission under Permitted Development legislation.”*

22.0 Appendix 2 – Development Management Consultation Process – Non Statutory Consultation

22.01 It is suggested that reference to design review be included, as noted in the recently adopted Strategic Planning Policy Statement:

- *“Not all information required to process an application will be from statutory consultees. There will be instances where non-statutory consultees may need to be consulted on a case by case basis. For example, this could include other Sections within the Council with responsibility for matters relating to environmental health or leisure facilities. Such consultees may also include other external organisations and bodies. For example, the establishment of design review arrangements can prove useful in supporting high standards of design in new development, particularly for major projects. The Ministerial Advisory Group for Architecture and the Built Environment in Northern Ireland can offer a design review resource for the Council in relation to significant projects. Non-statutory consultees are not bound by the 21 calendar days for a response; however they will be encouraged to respond to consultations in a similar timeframe and manner to allow decisions to be made in a timely manner. Due to wide range of development proposals submitted to the Council, each application will be carefully considered and consultations will be undertaken in line with statutory requirements. The need for consultation will vary between applications depending on the nature and scale of the proposal.”*

Arthur Acheson – MAG Chair

Alwyn Riddell – Chair of MAG Planning Subgroup, Chair of MAG Antrim & Newtownabbey Borough Council Subgroup

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