



**Birmingham City Council
Local Plan**

Statement of Community Involvement

Consultation Statement

December 2019

1. Introduction

- 1.1 This Consultation Statement has been prepared as a supporting document to the preparation of the updated Statement of Community Involvement (SCI). It details how the City Council has dealt with consultations, how comments (representations) have been sought, and how the representations that have been received have been addressed in the preparation and evolution of the SCI.
- 1.2 Birmingham is undergoing an exciting transformation over the next 15 years, which will see a significant level of development and delivery of infrastructure city wide. The SCI is crucial to ensure that consultees including statutory and non-statutory bodies, organisations and citizens are consulted and engaged with appropriately and in good time to encourage local people and organisations to help shape the places in which they live and help formulate the planning policies which impact their city.
- 1.3 The purpose of the SCI is to provide up-to-date information about how Birmingham City Council seeks to consult with its citizens and consultees when determining planning applications or drafting local planning policies whilst taking into consideration changes to relevant government legislation and the revised National Planning Policy Framework (NPPF). The information contained within the SCI provides further details about methods of consultation, planning policy consultations, development management consultations, pre-applications and the legal and policy requirements to be met when consulting with statutory and non-statutory consultees. Once adopted, the SCI will form part of the Local Development Framework for Birmingham.
- 1.4 Birmingham's first SCI was adopted in 2008. The revised SCI updates and supersedes the 2008 version to take account of a number of legislative changes as well as changes in methods of consultation. Following the consultation on the draft SCI in June 2019, a revised version of the SCI was subsequently prepared. This version of the SCI will be the final Statement of Community Involvement and is to be approved and adopted by the Cabinet on 21 January 2020.
- 1.5 The duty to prepare an updated SCI arises from the Planning and Compulsory Purchase Act 2004 (section 18) as amended by the Planning Act 2008, the Localism Act 2011 and the Neighbourhood Planning Act 2017. Section 18 of the Planning and Purchase Act 2004 requires local planning authorities to produce a Statement of Community Involvement, which explains how they will engage local communities and other interested parties in producing their local development plans and determining planning applications. The Town and Country Planning (Local Planning) (England) Regulations 2012 sets out statutory requirements that Local Authorities must comply with. The updated SCI is guided by the Government's Consultation Principles: Guidance (2018) which outlines how consultations should be conducted.

2. Consultation Process Overview

- 2.1 The draft revised SCI has been subject to an extensive process of consultation that has played an important role in helping to shape it. The public consultation was undertaken over a 3 month period from 3rd June 2019 to 6th September 2019. The City Council communicated the document in a number of ways that was suitable to meet the requirements of all audiences. These methods are summarised in the Table below and were carried out in accordance with an Engagement Strategy which was produced prior to the beginning of the consultation and attached as Appendix 2.

Method	Action Taken						
Direct consultation	<p>Letters were sent out to all contacts on the Planning Policy Consultation Database informing them of the consultation, how to access it and how to make representations. This included:</p> <ul style="list-style-type: none"> - Prescribed Specific Consultation Organisations - Other local authorities and County Councils - Primary Care Trusts/ Clinical Commissioning Groups - Utility and telecommunication companies/ undertakers - Voluntary, ethnic, religious and disability groups - Business groups and Local Enterprise Partnerships - Prescribed Duty to Cooperate organisations - Councillors/ MPs - Housing associations - Environmental groups and Local Nature Partnership - Parish/ town councils - Members of the public - Local businesses including planning consultants, surveyors and architects 						
Hard copies for inspection	<p>Hard copies of the consultation document were placed at City Council's main planning offices at 1 Lancaster Circus, Queensway, Birmingham B4 7DJ for the duration of the consultation period. Copies were also placed at all of the City Council's main libraries at the following locations:</p> <table> <tr> <td>Acocks Green Library</td><td>Aston Library</td></tr> <tr> <td>Balsall Heath Library</td><td>Bartley Green Library</td></tr> <tr> <td>Birchfield Library</td><td>Bloomsbury Library at The Pod</td></tr> </table>	Acocks Green Library	Aston Library	Balsall Heath Library	Bartley Green Library	Birchfield Library	Bloomsbury Library at The Pod
Acocks Green Library	Aston Library						
Balsall Heath Library	Bartley Green Library						
Birchfield Library	Bloomsbury Library at The Pod						

	<p> Boldmere Library Druids Heath Library Frankley Library Hall Green Library Harborne Library Kings Norton Library Library of Birmingham Northfield Library Quinton Library Shard End Library Small Heath Library Sparkhill Library Stirchley Library Tower Hill Library Ward End Library Yardley Wood Library </p> <p> Castle Vale Library Erdington Library Glebe Farm Library Handsworth Library Kings Heath Library Kingstanding Library Mere Green Library Perry Common Library Selly Oak Library Sheldon Library South Yardley Library Spring Hill Library Sutton Coldfield Library Walmley Library Weoley Castle Library </p>
Online	<p>A full copy of the SCI Consultation Document and method of submitting representations was published on the City Council's website on Monday 3rd June 2019 and maintained for the duration of the consultation until Friday 6th September 2019.</p> <p>The facility to make comments online was also provided, at https://www.birminghambeheard.org.uk/economy/sci on the same day, in line with the City Council's consultation policies and practice.</p>
Social Media	Two messages were posted on the City Council's Facebook and Twitter platforms at the beginning of the consultation period and towards the end to remind people if they wished to comment or respond.
Events	The SCI was consulted on at the Eat, Make Play event at Edgbaston Reservoir on 13 July 2019.
Meetings	<p>The SCI was discussed at the Access Birmingham meeting on 20th May 2019</p> <p>The SCI was discussed at Use-IT/ REMIX Project Participatory Meeting on 24 April 2019</p>
Alternative formats (available on a case by case basis)	Large print, typetalk and various languages available on request and when resources permit.

- 2.2 The City Council maintains a database of organisations and individuals who have expressed a wish to be consulted on planning policies or whom the City Council considers should be consulted as well as statutory consultees. Currently this list contains approximately 780 entries.
- 2.3 The database includes:
- All of the bodies prescribed for the purposes of the Duty to Co-operate in regulation 4 of the Regulations, apart from those which are not relevant to Birmingham.
 - The 'specific consultation bodies' listed in regulation 2 of the Regulations apart from those which are not relevant to Birmingham.
 - A range of bodies falling within the description of 'general consultation bodies' of the Regulations.
 - All adjoining and nearby County, District and Unitary Councils and all Parish Councils within or adjoining Birmingham.
 - All local elected members and MPs.
 - Private individuals and businesses who have previously commented on a planning policy consultation or who have expressed a wish to be included.
- 2.4 The database is a 'living' document which is updated on an ongoing basis, and organisations or individuals can be added to it on request at any time. The City Council does its best to ensure that the information contained in the database is accurate, but it is inevitable that the names of organisations or contact details will sometimes change, and the City Council will usually only be aware of this if notification is received. A copy of the database, excluding the details of private individuals, can be made available on request
- 2.5 During the twelve week consultation period, a total of 20 individuals/organisations responded generating approximately 150 separate comments. A summary of these, including the City Council's response to each point raised, is included as Appendix 1 to this Statement.

Summary of key issues raised

- 2.6 The key comments/ main issues raised were:
- General support for the aims, purpose, principles and objectives of the document
 - More opportunities for better methods of engagement and early engagement with the public in planning consultations to be maximised.
 - There needs to be more understanding about what role consultees including members of the public have in the planning consultation process
 - There needs to be continued engagement with a diverse range of bodies during planning consultations (such as Primary Care trusts)
 - More emphasis needs to be placed on the importance of the need to provide greater weight to those with protected characteristics as defined by the Equality Act 2010.

Appendix 1: Draft Statement of Community Involvement Consultation Summary of comments and BCC Response

Statement of Community Involvement Consultation: Summary of comments and BCC Response					
1/ Do you agree with the Consultation Principles described in the Introduction section?					
Response from:	Support Policy Approach?	Comments and Main Issues Raised	City Council Response	Action	Ref
Mr David Treadwell on behalf of Acocks Green Neighbourhood Forum and AGVP	yes	<ul style="list-style-type: none"> Public participation in planning, particularly at the initial stages, creates better decisions and provides people with the opportunity to shape local places. The opportunities for the public/citizen to engage with their local authorities is very poor Austerity policies and lack of structures in place at constituency and ward levels have exacerbated issues in relation to citizen engagement with local authorities public trust and confidence in the planning system is decreasing and that communities feel they are being marginalised When planning applications redact the details of the applicant, this prevents the local community the opportunity to appreciate who is involved or thinking of getting involved with the local area 	<ul style="list-style-type: none"> Agree about the importance of encouraging public participation in planning particularly at the initial stages. The City Council is looking for more effective ways in communicating with communities within the resources available to encourage greater and wider involvement of the public particularly at the policy formulation stage. Redaction of applicant's details is a legal requirement of the General Data Protection Regulations. However the SCI will help to encourage applicants and developers to engage more widely with local communities for major applications in particular. 	<ul style="list-style-type: none"> The City Council will continue to seek ways in which consultation and engagement can be improved corporately as well as for planning decisions. The importance of public participation at the initial stages of policy documents is to be emphasised within the revised SCI. For major applications in particular, the SCI will emphasise the need for developers to engage more widely with local communities when promoting their proposals. 	SCI/001/1
Mr Linden Thomas on behalf of the Birmingham Law Society	Yes	<ul style="list-style-type: none"> The Law Society agrees with the consultation principles described in the introduction section The Law Society states that the last bullet point should be amended as follows: "Commit to working with partners and communities in an open and 	<ul style="list-style-type: none"> The recommendation to amend the last bullet point of the consultation principles described in Chapter 1 is very useful and welcomed. 	<ul style="list-style-type: none"> SCI to be amended to include suggested wording to the last bullet point of the Consultation Principles within Chapter 1 (Introduction) 	SCI/003/1

		transparent manner involving all, including those with protected characteristics.”			
Canals & Rivers Trust	Yes	<ul style="list-style-type: none"> The Trust is generally supportive of the City Council's approach. 	<ul style="list-style-type: none"> Support welcomed 	<ul style="list-style-type: none"> No further action 	SCI/004/1
Individual comment on Beheard	Yes	<ul style="list-style-type: none"> None 	<ul style="list-style-type: none"> Support welcomed 	<ul style="list-style-type: none"> No further action 	SCI/008/1
Individual comment on Beheard	Yes	<ul style="list-style-type: none"> Birmingham City Council should be honest with consultees. Decisions are made on planning principles and officer advice. From observing Planning Committee meetings and decisions, it is very rare for a consultation to influence a decision. 	<ul style="list-style-type: none"> Birmingham City Council will always engage with members of the public in accordance with Development Management Procedure Order and the SCI. Officer recommendations are always made in accordance with planning policy, legislation and guidelines which exist to provide a consistent and fair approach to decision making as well as following the City Council's core values. 	<ul style="list-style-type: none"> No further action 	SCI/009/1
Individual comment on Beheard	Yes	<ul style="list-style-type: none"> None 	<ul style="list-style-type: none"> Support welcomed 	<ul style="list-style-type: none"> No further action 	SCI/010/1
Individual comment on Beheard	Yes	<ul style="list-style-type: none"> None 	<ul style="list-style-type: none"> Support welcomed 	<ul style="list-style-type: none"> No further action 	SCI/011/1
Individual comment on Beheard	Yes	<ul style="list-style-type: none"> None 	<ul style="list-style-type: none"> Support welcomed 	<ul style="list-style-type: none"> No further action 	SCI/012/1
Organisation comment on Beheard	Yes	<ul style="list-style-type: none"> None 	<ul style="list-style-type: none"> Support welcomed 	<ul style="list-style-type: none"> No further action 	SCI/013/1
Organisation comment on beheard	Yes	<ul style="list-style-type: none"> None 	<ul style="list-style-type: none"> Support welcomed 	<ul style="list-style-type: none"> No further action 	SCI/014/1
Organisation comments on beheard	Yes	<ul style="list-style-type: none"> Broadly agree with consultation principles 	<ul style="list-style-type: none"> Support welcomed 	<ul style="list-style-type: none"> No further action 	SCI/015/1
Organisation comments on beheard	Yes	<ul style="list-style-type: none"> Yes 	<ul style="list-style-type: none"> Support welcomed 	<ul style="list-style-type: none"> No further action 	SCI/016/1
Organisation comments on beheard	Yes	<ul style="list-style-type: none"> Yes, happy with the principles, in particular the commitment to work with partners and communities. 	<ul style="list-style-type: none"> Support welcomed 	<ul style="list-style-type: none"> No further action 	SCI/017/1
Organisation	Yes	<ul style="list-style-type: none"> Yes. Although we argue that the last 	<ul style="list-style-type: none"> The recommendation to amend the 	<ul style="list-style-type: none"> SCI to be amended to 	SCI/018/1

comments on beheard		bullet point should read: Commit to working with partners and communities in an open and transparent manner involving all, including those with protected characteristics.	last bullet point of the consultation principles described in Chapter 1 is very useful and welcomed.	include suggested wording to the last bullet point of the Consultation Principles within Chapter 1 (Introduction)	
Birmingham and Black Country Wildlife Trust Beheard	Yes	<ul style="list-style-type: none"> Yes 	<ul style="list-style-type: none"> Support welcomed 	<ul style="list-style-type: none"> No further action 	SCI/019/1

2/ Are there any other Consultation Principles the City Council should follow in consulting on its planning documents or planning applications?

Response from:	Support Policy Approach?	Comments and Main Issues Raised	LPA Response	Action	Ref
Mr David Treadwell on behalf of Acocks Green Neighbourhood Forum and AGVP	No	<ul style="list-style-type: none"> Democratise development and planning, by creating a Public Development Corporation which plans and regulates a fair and public accountable use of land and assets The planning process is a poor reflection of democracy because of the power it grants to landowners and developers who can resubmit planning applications and appeal. Objectors do not have the equivalent right to appeal a decision made in relation to a planning application 	<ul style="list-style-type: none"> Comments noted, but outside scope of consultation. Although a valid point, the creation of a Public Development Corporation would require changes to national legislation across and not within the powers of Birmingham City Council. Similarly, changing national legislation to allow objectors to appeal has long been debated but rejected on the grounds that it would undermine certainty in the planning process and could act to deter development as well as issues on how such a system could be equitably funded. 	<ul style="list-style-type: none"> No further action 	SCI/001/2
Mr Linden Thomas on behalf of the Birmingham Law Society	yes	<ul style="list-style-type: none"> Give weight to those who claim or deem themselves to have protected characteristics. 	<ul style="list-style-type: none"> The law society's recommendation is valid and useful and will be incorporated throughout the final document. 	<ul style="list-style-type: none"> Add references where appropriate to emphasise the need to provide greater weight to those with protected characteristics as defined by the Equality Act 2010. 	SCI/003/2
Canals & Rivers Trust	Yes	<ul style="list-style-type: none"> The Canals & Rivers Trust is not currently a statutory consultee for the purposes of planning policy consultations but is for the development management process As waterways serve multiple functions 	<ul style="list-style-type: none"> Birmingham City Council welcomes the comments from the Canals and Rivers Trust. The need for a robust policy framework which supports canals, rivers is incorporated into the adopted Birmingham Development 	<ul style="list-style-type: none"> No further action 	SCI/004/2

		and have varying characteristics there is no 'one size fits all' approach in planning policy and the canals and rivers trust believes that there is a need to strengthen existing planning policy at all spatial levels to provide a robust policy framework which supports canals, rivers and docks as a cross-cutting policy theme	Plan and other associated Planning Documents.		
Councillor Marje Bridle	No	<ul style="list-style-type: none"> • Unacceptable that just the bare minimum of consultation is done for planning applications • Consultation with the community should be meaningful – particularly where the planning application has potential real impact on a local community including local councillors being alerted in a meaningful way • The City Council should also ensure any letters are sent to a wide area of residents around the site and should be in Plain English and easily understood. 	<ul style="list-style-type: none"> • Birmingham City Council will always engage with members of the public on planning applications in accordance with the Development Management Procedure Order and the SCI. Birmingham City Council will seek to exceed these minimum standards wherever resources allow. The City Council will continue to seek more effective ways of publicising and consulting on planning applications without increasing the limited budgets it has to carry this out. • In relation to planning applications this includes: <ul style="list-style-type: none"> • Publishing the application details on the City Council's website and how to comment; • Letter to the owners/occupiers of properties adjoining the application site advising of application and the period in which to submit comments; and/ or • Site notice placed in or near sites subject to applications for development; and or • Publishing a notice in the local press for certain types of development • A weekly list of all new applications received by the City Council is posted on its website • Depending on the proposal, we will 	<ul style="list-style-type: none"> • Emphasise need for plain English in correspondence as a requirement within the Statement of Community Involvement 	SCI/005/2

			<p>also consult with:</p> <ul style="list-style-type: none"> • Various statutory and non-statutory consultees, other bodies and interest groups relevant to the proposal and Duty to Cooperate bodies on major strategic applications or (neighbouring authorities on applications for development close to the City boundary. • In relation to the preparation of DPDs and SPD, the City Council will engage and consult with the Specific and General Consultation Bodies and the Duty to Co-operate Bodies set out in the regulations, as well as relevant residents and businesses in the area and other stakeholders, There is sufficient flexibility in the SCI to cater an engagement strategy to the relevant area being planned for. • In terms of the consultation letters being made easier to understand, the City Council will continue to review the letters which are sent out to see if simpler language can be used. This is a requirement which will be set out in the Statement of Community Involvement. 		
Individual comment on Beheard	Don't know	<ul style="list-style-type: none"> • None 	<ul style="list-style-type: none"> • No Comment 	<ul style="list-style-type: none"> • No further action 	SCI/008/2
Individual comment on Beheard	Yes	<ul style="list-style-type: none"> • Openness and transparency includes making it clear to consultees that their views have a limited place in the planning system. The dashing of raised expectations only breeds cynicism. • The fundamental point about consultations is that they are 'window dressing'. If a response is material the officer will already have picked it up, if it is non-material it is ignored. 	<ul style="list-style-type: none"> • Support welcomed and comments noted. 	<ul style="list-style-type: none"> • No further action 	SCI/009/2
Individual comment on Beheard	Yes	<ul style="list-style-type: none"> • None 	<ul style="list-style-type: none"> • Support welcomed 	<ul style="list-style-type: none"> • No further action 	SCI/010/2

Individual comment on Beheard	Yes	<ul style="list-style-type: none"> • Should be consultation when HMOs are moving into an area. • There are large numbers of people in Birmingham living in small homes. 	<ul style="list-style-type: none"> • Resources would not permit the City Council to consult widely on all HMOs. However the City Council is currently establishing an Article 4 Direction on the whole City which means that every HMO will require planning permission (not just the large ones). This will help to control their numbers but also allow for publicity whenever new HMOs are proposed in accordance with National Planning Legislation and relevant policy and guidance. 	<ul style="list-style-type: none"> • No further action 	SCI/011/2
Individual comment on Beheard	Yes	<ul style="list-style-type: none"> • Comment complaining about the proliferation of HMOs in Erdington. 	<ul style="list-style-type: none"> • The City Council is currently establishing an Article 4 Direction on the whole City which means that every HMO will require planning permission (not just the large ones). This will help to control their numbers but also allow for publicity whenever new HMOs are proposed in accordance with National Planning Legislation and relevant policy and guidance. 	<ul style="list-style-type: none"> • No further action 	SCI/012/2
Group comment on Beheard	Yes	<ul style="list-style-type: none"> • There should be a principle of supporting collaborative knowledge that helps groups to participate in the process and mobilises hard-to-reach groups to make sense of the SCI articulated by communities. Even for professionals the documentation is daunting so having a mechanism in which the consultation is assessed by a group of resident experts (e.g., accredited community researchers) would be an enhancement of the consultation process and would give greater legitimacy, reach and validity to the consultation principles. One of the ideas we have been considering (CURS/University of Birmingham) is a qualification / certificate in community planning that supports skills in communities to understand the planning process. 	<ul style="list-style-type: none"> • Although this is beyond the scope and remit of the Statement of Community Involvement, it is an idea that could be considered in the future as part of the City Council's commitment to improve the effectiveness of consultations and engagement corporately, as well as on planning documents and applications. 	<ul style="list-style-type: none"> • The City Council will continue to seek ways in which consultation and engagement can be improved corporately as well as for planning decisions 	SCI/013/2

Organisation comment on Beheard	Yes	<ul style="list-style-type: none"> Environment and sustainability should be the central principle, not just a factor. 	<ul style="list-style-type: none"> Environment and sustainability are important factors which are central to national and local planning policy. 	<ul style="list-style-type: none"> No further action 	SCI/014/2
Organisation comment on Beheard	Yes	<ul style="list-style-type: none"> Yes 	<ul style="list-style-type: none"> Support welcomed. 	<ul style="list-style-type: none"> No further action 	SCI/015/2
Organisation comments on beheard	Yes	<ul style="list-style-type: none"> No 	<ul style="list-style-type: none"> Support welcomed. 	<ul style="list-style-type: none"> No further action 	SCI/016/2
Organisation comments on beheard	Yes	<ul style="list-style-type: none"> Principles cover all of the appropriate areas - maybe worth referencing the STP - but this is probably covered by the ninth principle. 	<ul style="list-style-type: none"> Support welcomed. 	<ul style="list-style-type: none"> No further action 	SCI/017/2
Organisation comments on beheard	Yes	<ul style="list-style-type: none"> Give weight to those who claim or deem themselves to have protected characteristics. 	<ul style="list-style-type: none"> The point made is valid and useful and will be incorporated throughout the final document. Birmingham City Council will always adhere to its public sector equality duty as defined by the Equality Act 2010 when consulting with members of the public and other consultees. 	<ul style="list-style-type: none"> Add references where appropriate to emphasise the need to provide greater weight to those with protected characteristics as defined by the Equality Act 2010 	SCI/018/2
Birmingham and Black Country Wildlife Trust Beheard	Yes	<ul style="list-style-type: none"> The Birmingham and Black Country Wildlife Trust would seek for an amendment to an existing principle or new principle added, that would include a statement ensuring the all relevant public bodies and consultees are directly consulted upon on its planning policies and applications. This will aim to ensure the consultees and bodies have sufficient time to respond to consultations 	<ul style="list-style-type: none"> BCC already consults BBCWT on the preparation of planning policy documents as they are included on the Council's Planning Policy Consultation Database. In terms of planning applications, BCC publish a weekly list of registered planning applications which is publicly accessible. We would, however, welcome discussions with BBCWT on how to enhance consultation in this area. 	<ul style="list-style-type: none"> No further action 	SCI/019/2

3/ Are there any other methods of consultation and engagement that the City Council can utilize in the preparation of Development Plan Documents and Supplementary Planning Documents?

Response from:	Support Policy Approach?	Comments and Main Issues Raised	LPA Response	Action	Ref
Mr David Treadwell on behalf of Acocks Green Neighbourhood Forum and AGVP	No	<ul style="list-style-type: none"> Local authorities lack the resources and powers to uphold and deliver the rightful interests of the citizen and communities Some development proposals do not reflect policies and plans made at national or local level. 	<ul style="list-style-type: none"> Local authorities are constrained by resources in how much they can actively engage and consult on all development decisions within their area. All Planning applications submitted to Birmingham City Council are assessed in accordance with national and local policy 	<ul style="list-style-type: none"> No further action 	SCI/001/3
Mr Linden Thomas on behalf of the Birmingham Law Society	Yes	<ul style="list-style-type: none"> A Leaflet drop and direct engagement with elected members and informing political party offices in affected areas would help when preparing future Development Plan Documents and Supplementary Planning Documents 	<ul style="list-style-type: none"> The engagement strategy for DPD and SPDs could be tailored according to the nature of the document to include such methods. 	<ul style="list-style-type: none"> No Further action 	SCI/003/3
Individual comment on Beheard	Yes	<ul style="list-style-type: none"> None 	<ul style="list-style-type: none"> Support welcomed 	<ul style="list-style-type: none"> No further action 	SCI/008/3
Individual comment on Beheard	Yes	<ul style="list-style-type: none"> None 	<ul style="list-style-type: none"> Support welcomed 	<ul style="list-style-type: none"> No further action 	SCI/009/3
Individual comment on Beheard	Yes	<ul style="list-style-type: none"> Letters notifying residents of planning applications should be addressed personally to the home owner. Using the basic prefix "owner/occupier" means that notifications can often be unopened and treated as junk mail. 	<ul style="list-style-type: none"> All envelopes in which letters notifying residents of planning applications have the wording "Important Papers inside – Please read" written on them so that people can distinguish these letters from ordinary junk mail. Birmingham City Council's Registrations team which sends out notification letters does not have access to the names and details of occupiers for 'Data Protection' reasons so therefore cannot include this information on notification letters 	<ul style="list-style-type: none"> No further action 	SCI/010/3
Individual comment on Beheard	Yes	<ul style="list-style-type: none"> Comment complaining about the proliferation of HMOs in Erdington. 	<ul style="list-style-type: none"> The City Council is currently establishing an Article 4 Direction on the whole City which means that every HMO will require planning permission 	<ul style="list-style-type: none"> No further action 	SCI/012/3

			(not just the large ones). This will help to control their numbers but also allow for publicity whenever new HMOs are proposed in accordance with National Planning Legislation and relevant policy and guidance.		
Group comment on Beheard	Yes	<ul style="list-style-type: none"> A more transparent and embedded mechanism of community research engagement and empowerment run by a social community enterprise in partnership with the HE / Third sector in the West Midlands region and partly funded by corporate partners. This would join up activities and link communities to a wider network of opportunities that could benefit communities, the HE sector and city-regional governance in a number of ways: <ol style="list-style-type: none"> 1) A more coordinated approach to community research refined through the input of community representatives. 2) Provide additional resources for local communities through leveraging income streams related to research grants. 3) Provide a mechanism for social mobility. 4) The community can play a larger role in influencing policy beyond the local level. 5) Provide a mechanism to animate CIL (Community Infrastructure Levy), corporate social responsibility and social value (and the Social Value Act) 	<ul style="list-style-type: none"> The comments are welcomed and helpful. The suggested approach would help communities to engage more effectively in the planning process. It is an idea that could be considered in the future as part of the City Council's commitment to improve the effectiveness of consultations and engagement corporately, as well as on planning documents and applications. 	<ul style="list-style-type: none"> The City Council will continue to seek ways in which consultation and engagement can be improved corporately as well as for planning decisions. 	SCI/013/3
Organisation comment on beheard	Yes	<ul style="list-style-type: none"> I would like to see an environmental planning document for each proposal. 	<ul style="list-style-type: none"> Planning applications will be determined against the City Council's Development Plan which contains policies in relation to the environment and sustainability. The information required to be submitted for planning 	<ul style="list-style-type: none"> No further action 	SCI/014/3

			applications is set out in the City Council's Local Validation Requirements. Information requirements must meet the criteria set out in the Development Management Procedure Order and the Growth and Infrastructure Act.		
Organisation comment on beheard	Yes	<ul style="list-style-type: none"> The issue is to engage rather than purely consult. Engagement could involve the following: <ul style="list-style-type: none"> - adequate publicity of proposed developments / a policy is pointless if those affected are unaware of a development / BCC has therefore to commit to well-advertised and accessible data - SPDs should be subject to expert and community review / assessment on adequacy and impact within the affected community so that they properly understand the impact or have a voice. For Langley the consultation on the SPD appeared to be thorough and effectively managed but only in the sense of formal consultative process. There was little attempt at a design approach based on local context - instead it contained illustrations of national architectural exemplars. - 	<ul style="list-style-type: none"> The City Council agrees that community involvement in the plan-making process requires both engagement and consultation. The SCI tries to emphasise greater frontloading and early involvement to ensure that future policies and decisions are made with appropriate engagement and buy in from local communities as resources permit. 	<ul style="list-style-type: none"> The frontloading of community involvement will have increased emphasis within the final version of the document. 	SCI/015/3
Organisation comments on beheard	Yes	<ul style="list-style-type: none"> Concerned that staffing levels within the local authority do not allow for effective consultation. 	<ul style="list-style-type: none"> Whilst Birmingham City Council has undergone budget cuts and resource constraints, it has always engaged with members of the public in accordance to at least the minimum standards required for consultation as outlined in National Planning Legislation and the SCI. The SCI will ensure that this will continue or possibly seek to exceed these minimum standards wherever possible and insofar as resources allow. 	<ul style="list-style-type: none"> No further action 	SCI/016/3

Organisation comments on beheard	Yes	<ul style="list-style-type: none"> Would be worth considering engaging with the Primary Care Commissioning Committee of the CCG with respect to Section 106 opportunities for primary care developments at a time when we are looking at closer collaboration to ensure a more cost effective approach. 	<ul style="list-style-type: none"> Primary Care Trusts/ CCGs are a Specified Consultation Body for the purposes of consultation and public participation on the preparation of DPDs and SPDs, as set down in the Town and Country Planning (Local Planning) (England) Regulations 2012. The City Council will continue to consult them during the plan-making process. 	<ul style="list-style-type: none"> No further action 	SCI/017/3
Organisation comments on beheard	Yes	<ul style="list-style-type: none"> Leaflet drop and direct engagement with Elected members and to let us know political party offices in affected areas. 	<ul style="list-style-type: none"> The engagement strategy for DPD and SPDs could be tailored according to the nature of the document to include such methods. 	<ul style="list-style-type: none"> No further action 	SCI/018/3
Birmingham and Black Country Wildlife Trust Beheard	Yes	<ul style="list-style-type: none"> No 	<ul style="list-style-type: none"> No further action 	<ul style="list-style-type: none"> No further action 	SCI/019/3

4/ Are there any processes or opportunities for engagement missing from Table 1 or Table 2 of the draft SCI?

Response from:	Support Policy Approach?	Comments and Main Issues Raised	LPA Response	Action	Ref
Mr David Treadwell on behalf of Acocks Green Neighbourhood Forum and AGVP	No	<ul style="list-style-type: none"> The system ensures the market is dominated by speculation and self-interest to the detriment of the public. 	<ul style="list-style-type: none"> Comments welcomed 	<ul style="list-style-type: none"> No further action 	SCI/001/4
Mr Linden Thomas on behalf of the Birmingham Law Society	Yes	<ul style="list-style-type: none"> Do not rely purely on electronic engagement or use of social media to avoid disadvantaging those without IT skills / access / English as a native speaker or those who choose for whatever reason to avoid the use of social media in any form. 	<ul style="list-style-type: none"> The SCI does not specify which method of consultation Birmingham City Council will use but instead specifies that the City Council will utilise a variety of consultation methods according to the circumstances and the needs of each target audience. This allows flexibility and Birmingham City Council can tailor methods of consultation according to the needs of each target audience (including those whom may not be able to use electronic methods of engagement) 	<ul style="list-style-type: none"> No Further action 	SCI/003/4

Canals & Rivers Trust	Yes	<ul style="list-style-type: none"> The Canals & Rivers Trust would encourage Birmingham City Council to enter into pre-application discussions with them and believe this should be reflected in the SCI as a commitment to include statutory consultees in Birmingham City Council's own pre-application process or direct applicants for pre-application advice. The canals & Rivers Trust believes that the formulation of planning policy which identifies approaches to promote access to the canals and waters network is highly important to help realise the positive benefit of the canal and waterways network to local communities 	<ul style="list-style-type: none"> Birmingham City Council welcomes the comments from the Canals and Rivers Trust. A robust policy framework which supports canals and rivers is already included in the adopted Birmingham Development Plan and other associated Planning Documents. 	<ul style="list-style-type: none"> No further action. 	SCI/004/4
Natural England	Yes	<ul style="list-style-type: none"> Natural England is supportive of the principle of meaningful and early engagement of the general community, community organisations and statutory bodies in local planning matters, both in terms of shaping policy and participating in the process of determining planning applications 	<ul style="list-style-type: none"> Support welcomed. 	<ul style="list-style-type: none"> No further action 	SCI/006/4
Individual comment on Beheard	Yes	<ul style="list-style-type: none"> None 	<ul style="list-style-type: none"> Support welcomed 	<ul style="list-style-type: none"> No further action 	SCI/008/4
Individual comment on Beheard	Yes	<ul style="list-style-type: none"> None 	<ul style="list-style-type: none"> Support welcomed 	<ul style="list-style-type: none"> No further action 	SCI/009/4
Individual comment on Beheard	Yes	<ul style="list-style-type: none"> None 	<ul style="list-style-type: none"> Support welcomed 	<ul style="list-style-type: none"> No further action 	SCI/010/4
Individual comment on Beheard	Yes	<ul style="list-style-type: none"> I don't think that awareness-raising is effective enough. Places where consultation information is placed is not visible enough. Therefore, it is not until the last minute that communities can respond. 	<ul style="list-style-type: none"> Birmingham City Council will always publicise a planning application in accordance with the Development Management Procedure Order and in accordance with the SCI. This includes: <ul style="list-style-type: none"> Publishing the application details on the City Council's website and how to comment; 	<ul style="list-style-type: none"> No further action 	SCI/011/4

			<ul style="list-style-type: none"> Letter to the owners/occupiers of properties adjoining the application site advising of application and the period in which to submit comments; and/ or Site notice placed in or near sites subject to applications for development; and or Publishing a notice in the local press for certain types of development A weekly list of all new applications received by the City Council is posted its website Depending on the proposal, we will also consult with: <ul style="list-style-type: none"> Various statutory and non-statutory consultees, other bodies and interest groups relevant to the proposal Duty to Cooperate bodies on major strategic applications or neighbouring authorities on applications for development close to the City boundary 		
Individual comment on Beheard	Yes	<ul style="list-style-type: none"> Consultations with normal home dwellers 	<ul style="list-style-type: none"> Birmingham City Council will always publicise a planning application in accordance with the Development Management Procedure Order and in accordance with the SCI. This includes: <ul style="list-style-type: none"> Publishing the application details on the City Council's website and how to comment; Letter to the owners/occupiers of properties adjoining the application site advising of application and the period in which to submit comments; and/ or Site notice placed in or near sites subject to applications for 	<ul style="list-style-type: none"> No further action 	SCI/012/4

			<ul style="list-style-type: none"> development; and or • Publishing a notice in the local press for certain types of development • A weekly list of all new applications received by the City Council is posted on its website • Depending on the proposal, we will also consult with: <ul style="list-style-type: none"> • Various statutory and non-statutory consultees, • other bodies and interest groups relevant to the proposal • Duty to Cooperate bodies on major strategic applications or neighbouring authorities on applications for development close to the City boundary 		
Group comment on beheard	Yes	<ul style="list-style-type: none"> • A Community Research Social Enterprise would provide a starting point for developing consultation strategy. Given the depth of knowledge and local expertise, it could bring the necessary legitimacy to broker relationships across the city-region and assist in developing depth and diversity in all 'planning' processes. As a recognised and valued partner, it would have the visibility and local presence to make 'lost voices' heard; and with an extensive network of accredited local experts, it will have the ability to locate local assets, identify excluded groups in the community and, together with strategic partners, unlock social and economic innovation. 	<ul style="list-style-type: none"> • The suggested approach could possibly help communities to engage more effectively in the planning process is an idea that could be considered in the future as part of the City Council's commitment to improve the effectiveness of consultations and engagement corporately as well as on planning documents and applications. 	<ul style="list-style-type: none"> • The City Council will continue to seek ways in which consultation and engagement can be improved corporately as well as for planning decisions. 	SCI/013/4
Organisation comment on beheard	Yes	<ul style="list-style-type: none"> • Environmental considerations should feature in pre planning 	<ul style="list-style-type: none"> • Environment and sustainability are important factors which are central to national and local planning policy. The adopted Birmingham Development Plan, against which planning applications are assessed, contains 	<ul style="list-style-type: none"> • No further action 	SCI/014/4

			key policies in relation to the environment and sustainability.		
Organisation comment on beheard	Yes	<ul style="list-style-type: none"> Consultation has to be differentiated from engagement and an engagement programme clearly spelt out - for example: <ul style="list-style-type: none"> use of workshops instead of online process programme of awareness and training to raise understanding / grow local voices local practitioner review that has teeth linked to the DC process BCC robustly encouraging developers to engage three way with them and community reps including (for Sutton) the Town Council National facilitators can assist (such as Design Council / Cabe). 	<ul style="list-style-type: none"> The City Council agrees that community involvement in plan-making requires both engagement and consultation. The SCI emphasises greater 'frontloading' and early involvement to ensure that future policies and decisions are made with appropriate engagement and buy in from local communities as resources permit. 	<ul style="list-style-type: none"> The City Council will continue to seek ways in which consultation and engagement can be improved corporately as well as for planning decisions. 	SCI/015/4
Organisation comments on beheard	Yes	<ul style="list-style-type: none"> No processes missing - only the staff to implement them 	<ul style="list-style-type: none"> Whilst Birmingham City Council has undergone budget cuts and resource constraints in recent years, it has always engaged with members of the public in accordance to at least the minimum standards required for consultation. The SCI will ensure that this will continue or possibly seek to exceed these minimum standards wherever possible and insofar as resources allow. 	<ul style="list-style-type: none"> No further action 	SCI/016/4
Organisation comments on beheard	Yes	<ul style="list-style-type: none"> Reference to how the Section 106 arrangements can be accessed and the process for engagement for that resource to support the impact on health as well as other key system areas would be helpful - possibly to include in table 1? 	<ul style="list-style-type: none"> Comments noted. This is not within the remit of the SCI - consultees can make comments through separate consultation for s.106 spending and opportunities. 	<ul style="list-style-type: none"> No further action 	SCI/017/4
Organisation comments on beheard	Yes	<ul style="list-style-type: none"> Do not rely purely on electronic engagement or use of social media to avoid disadvantaging those without IT skills / access / English as a native speaker or those who choose for whatever reason to avoid the use of 	<ul style="list-style-type: none"> The SCI does not specify which method of consultation Birmingham City Council will use but instead specifies that the City Council will utilise a variety of consultation methods according to the 	<ul style="list-style-type: none"> No further action 	SCI/018/4

		social media in any form.	circumstances and the needs of each target audience. This allows flexibility and Birmingham City Council can tailor methods of consultation according to the needs of each target audience (including those whom may not be able to use electronic methods of engagement)		
Birmingham and Black Country Wildlife Trust Beheard	Yes	<ul style="list-style-type: none"> No processes or opportunities for engagement missing 	<ul style="list-style-type: none"> Support welcomed 	<ul style="list-style-type: none"> No further action 	SCI/019/4

5/ Are there any other opportunities for engagement in the preparation of Neighbourhood Plans missing from Table 3?

Response from:	Support Policy Approach	Comments and Main issues raised	LPA Response	Action	Reference
Mr David Treadwell on behalf of Acocks Green Neighbourhood Forum and AGVP	Yes	<ul style="list-style-type: none"> When the opportunities arise, AGNF and AGVP highlight good developments that have considered the local environment and are a positive addition to the area 	<ul style="list-style-type: none"> Comments welcomed 	<ul style="list-style-type: none"> No further action 	SCI/001/5
Mr Linden Thomas on behalf of the Birmingham Law Society	Yes	<ul style="list-style-type: none"> Engage Elected Members for the relevant localities 	<ul style="list-style-type: none"> The process as set out in Table 3 requires the City Council to write to specific, general and other relevant consultees which includes relevant elected members at certain stages of the Neighbourhood Plan making process. It is however the role of the Forum to undertake ongoing consultation and engagement with the community and relevant consultees in the preparation of Neighbourhood Plans. 	<ul style="list-style-type: none"> No further action 	SCI/003/5
The Canals & Rivers Trust	Yes	<ul style="list-style-type: none"> As neighbourhood plans are produced by local communities, the Canals & Rivers Trust only become aware of 	<ul style="list-style-type: none"> The process as set out in Table 3 requires the City Council to write to specific, general and other relevant 	<ul style="list-style-type: none"> No further action 	SCI/004/5

		<p>neighbourhood plans at a very late stage in their production</p> <ul style="list-style-type: none"> • The Canals & Rivers trust notes that Birmingham City Council provides advice on consultation and engagement to community groups, but they do not consider that this goes far enough in terms of outlining the type of information to be provided • It would be helpful if groups could be given contact details for all relevant consultees and interested stakeholders to assist with early engagement and consultation 	<p>consultees which include relevant elected members at certain stages of the Neighbourhood Plan making process. It is however the role of the Forum to undertake ongoing consultation and engagement with the community and relevant consultees in the preparation of Neighbourhood Plans.</p> <ul style="list-style-type: none"> • As stated in Table 3 the City Council will provide advice and information to Neighbourhood Forums and contact information to assist consultation, publicity and engagement. 		
Individual comment on Beheard	Yes	<ul style="list-style-type: none"> • None 	<ul style="list-style-type: none"> • Support welcomed 	<ul style="list-style-type: none"> • No further action 	SCI/008/5
Individual comment on Beheard	Yes	<ul style="list-style-type: none"> • Sutton Coldfield Town Council needs to be more adequately consulted 	<ul style="list-style-type: none"> • Birmingham City Council has a consultation database for policy documents and proposals containing contact details for all relevant consultees and interested stakeholders including Sutton Town Council. • The Statement of Community involvement refers to early engagement in relation to both planning policy and planning application consultations. This can be tailored to the needs of particular areas and of particular groups to provide more effective consultation and involvement. 	<ul style="list-style-type: none"> • The City Council will continue to seek ways in which consultation and engagement can be improved corporately as well as for planning decisions with communities and groups such as Sutton Coldfield Town Council. 	SCI/009/5
Individual comment on Beheard	Yes	<ul style="list-style-type: none"> • Notify Homeowners personally 	<ul style="list-style-type: none"> • Birmingham City Council will always publicise a planning application in accordance with the Development Management Procedure Order and in accordance with the SCI. This includes: <ul style="list-style-type: none"> • Publishing the application details on the City Council's website and how to comment; • Letter to the owners/occupiers of properties adjoining the application site advising of 	<ul style="list-style-type: none"> • No further action 	SCI/010/5

			<p>application and the period in which to submit comments; and/ or</p> <ul style="list-style-type: none"> • Site notice placed in or near sites subject to applications for development; and or • Publishing a notice in the local press for certain types of development • A weekly list of all new applications received by the City Council is posted on its website • Depending on the proposal, we will also consult with: <ul style="list-style-type: none"> • Various statutory and non-statutory consultees, • other bodies and interest groups relevant to the proposal • Duty to Cooperate bodies on major strategic applications or neighbouring authorities on applications for development close to the City boundary 		
Individual comment on Beheard	Yes	<ul style="list-style-type: none"> • Work with Community Researchers 	<ul style="list-style-type: none"> • The suggested approach would help communities to engage more effectively in the planning process. Although this is beyond the scope and remit of the Statement of Community Involvement, it is an idea that could be considered in the future as part of the City Council's commitment to improve the effectiveness of consultations and engagement on planning documents and applications. 	<ul style="list-style-type: none"> • The City Council will continue to seek ways in which consultation and engagement can be improved corporately as well as for planning decisions. 	SCI/011/5
Individual comment on Beheard	Yes	<ul style="list-style-type: none"> • There are many other opportunities for engagement in the preparation of Neighbourhood Plans 	<ul style="list-style-type: none"> • Comment noted 	<ul style="list-style-type: none"> • No further action 	SCI/012/5
Group comment onbeheard	Yes	<ul style="list-style-type: none"> • Increasing the capacity of communities to engage through a community research social enterprise and an accredited community planning qualification would increase the capacity of communities to consider 	<ul style="list-style-type: none"> • The suggested approach could possibly help communities to engage more effectively in the planning process. it is an idea that could be considered in the future as part of the City Council's commitment to improve 	<ul style="list-style-type: none"> • The City Council will continue to seek ways in which consultation and engagement can be improved corporately as well as 	SCI/013/5

		neighbourhood planning and to develop engagement skills and social capital in areas of the city where there is a deficit.	the effectiveness of consultations and engagement corporately as well as on planning documents and applications.	for planning decisions.	
Organisation comment on beheard	Yes	<ul style="list-style-type: none"> Environmental considerations should feature for each proposal 	<ul style="list-style-type: none"> Environment and sustainability are important factors which are central to national and local planning policy. The adopted Birmingham Development Plan, against which planning applications are assessed, contains key policies in relation to the environment and sustainability. 	<ul style="list-style-type: none"> No further action 	SCI/014/5
Organisation comment on beheard	Yes	<ul style="list-style-type: none"> Neighbourhood plans should be an integral element in effective community planning. For Langley our initial response was to propose a NP linked to CIL only to find out further down the line this was not allowable. And the idea (strongly promoted) to link SUEs to Town Centre. NP key to this. Yet process made little reference with all the heavy lifting falling on the community itself. 	<ul style="list-style-type: none"> Comments noted. This issue is not directly relevant to the Statement of Community involvement and its consultation. 	<ul style="list-style-type: none"> No further action 	SCI/015/5
Organisation comments on beheard	Yes	<ul style="list-style-type: none"> No processes missing - only the staff to implement them 	<ul style="list-style-type: none"> Whilst Birmingham City Council has undergone budget cuts and resource constraints in recent years, it has always engaged with members of the public in accordance to at least the minimum standards required. The SCI will ensure that this will continue or possibly seek to exceed these minimum standards wherever possible and insofar as resources allow. 	<ul style="list-style-type: none"> No further action 	SCI/016/5
Organisation comments on beheard	Yes	<ul style="list-style-type: none"> Hard to see specific reference to collaboration with health as well as City Council priorities - this is an opportunity to divert some Levy funding to joint ventures as defined by the STP. 	<ul style="list-style-type: none"> Consultees (including the Primary Care Commissioning Committee of the CCG) on the City Council's database will continue to be consulted on all planning documents including Neighbourhood plans. However greater co-operation and closer working in the future is possible as the Council continues to improve its consultation and engagement in a 	<ul style="list-style-type: none"> The City Council will continue to seek ways in which consultation and engagement can be improved corporately as well as for planning decisions. 	SCI/017/5

			more co-ordinated way.		
Organisation comments on beheard	Yes	<ul style="list-style-type: none"> Engage Elected Members for the relevant localities 	<ul style="list-style-type: none"> The process as set out in Table 3 requires the City Council to write to specific, general and other relevant consultees which includes relevant elected members at certain stages of the Neighbourhood Plan making process. It is however the role of the Forum to undertake ongoing consultation and engagement with the community and relevant consultees in the preparation of Neighbourhood Plans. 	<ul style="list-style-type: none"> The City Council will continue to seek ways in which consultation and engagement can be improved corporately as well as for planning decisions. 	SCI/018/5
Birmingham and Black Country Wildlife Trust Beheard	Yes	<ul style="list-style-type: none"> No 	<ul style="list-style-type: none"> Support welcomed 	<ul style="list-style-type: none"> No further action 	SCI/019/5

6/ Are there any processes or opportunities for engagement missing from Table 4 in setting or changing the Community Infrastructure Levy (CIL)?

Response from:	Support Policy Approach	Comments and Main issues raised	LPA Response	Action	Ref.
Mr Linden Thomas on behalf of the Birmingham Law Society	Yes	<ul style="list-style-type: none"> Ensure all known political parties within potentially affected areas are aware of the consultations and all subsequent documents. Do not rely on social media for those who are unable to access or choose to avoid such media. 	<ul style="list-style-type: none"> Comments noted. The SCI would allow for this and does not rely on social media. 	<ul style="list-style-type: none"> The City Council will continue to seek ways in which consultation and engagement can be improved corporately as well as for planning decisions. 	
Canals & Rivers Trust	Yes	<ul style="list-style-type: none"> The Canals & Rivers Trust have stated that section 4 usefully sets out the process for adopting CIL charging schedule and key opportunities for engagement It would be helpful if the SCI included details of how stakeholders can identify projects eligible for CIL funding going forward 	<ul style="list-style-type: none"> All CIL funded projects should support the growth of Birmingham, as outlined within the Birmingham Development Plan are identified in the Infrastructure Delivery Plan. (IDP) The IDP, rather than the SCI is the vehicle for how stakeholders can identify projects eligible for CIL funding going forward 	<ul style="list-style-type: none"> No further action 	SCI/004/6
Councillor Marje Bridle	No	<ul style="list-style-type: none"> Councillors are not properly informed on potential section 106 money due to come to the local community. 	<ul style="list-style-type: none"> Local councillors receive reports six monthly outlining which S106 funds are available in their area. 	<ul style="list-style-type: none"> The City Council will continue to seek ways in which consultation 	SCI/005/6

		<ul style="list-style-type: none"> There needs to be a root and branch shake up of how councillors are involved on behalf of the local community in arrangements for the provision of Section 106 money and for how this money might be spent locally in the ward 	<ul style="list-style-type: none"> Changes have been made to reporting to ensure the reports accurately reflect which funds are available, and should changes be proposed to existing S106 agreements, these will be taken to Planning Committee before any amendments are made. Whilst continuing to provide the above, the issue is not something which is within the remit of the Statement of Community Involvement but can be looked at corporately to identify possible improvements. 	<ul style="list-style-type: none"> and engagement can be improved corporately as well as for planning decisions. 	
Individual comment on Beheard	Don't know	<ul style="list-style-type: none"> None 	<ul style="list-style-type: none"> No Comment 	<ul style="list-style-type: none"> No further action 	SCI/008/6
Individual comment on Beheard	Yes	<ul style="list-style-type: none"> None 	<ul style="list-style-type: none"> Support welcomed 	<ul style="list-style-type: none"> No further action 	SCI/009/6
Individual comment on Beheard	Yes	<ul style="list-style-type: none"> None 	<ul style="list-style-type: none"> Support welcomed 	<ul style="list-style-type: none"> No further action 	SCI/010/6
Individual comment on Beheard	Yes	<ul style="list-style-type: none"> The consultation needs to be more transparent. Maybe the community could have a say in how CIL is spent. 	<ul style="list-style-type: none"> The only part of CIL spending subject to consultation under current legislation is the Local CIL contribution (15% of receipts from the area in which development takes place and only to be spent in that area). The City Council retains these receipts but will engage with the communities where development has taken place to agree how best to spend it. The use of neighbourhood funds should match priorities expressed by local communities. The City Council is considering the administration and governance arrangements for these sums of money anticipating the funds will be aligned to projects outlined in Ward Plans. 	<ul style="list-style-type: none"> The City Council will continue to seek ways in which consultation and engagement can be improved corporately as well as for planning decisions. 	SCI/011/6
Individual comment on Beheard	Yes	<ul style="list-style-type: none"> There are many other opportunities for engagement in the preparation of Neighbourhood Plans 	<ul style="list-style-type: none"> Support welcomed 	<ul style="list-style-type: none"> No further action 	SCI/012/6
Group comment	Yes	<ul style="list-style-type: none"> Preparing the evidence base to inform 	<ul style="list-style-type: none"> Comments are noted. The SCI 	<ul style="list-style-type: none"> The City Council will 	SCI/013/6

on Beheard		<p>the Preliminary Draft Charging Schedule (PDCS) involves 'informal consultation and engagement with key stakeholders and interested parties'. This is vague. The recommendation that the city invests and supports a community research social enterprise (CRSE) would enable a broader consultation on how CIL could be delivered to support grassroots and sustainable development.</p>	<p>provides flexibility and guidance to ensure at least a minimum standard of consultation and engagement is achieved and exceeded when deemed necessary or important.</p> <ul style="list-style-type: none"> Birmingham City Council will always engage with citizens across the city in accordance with the minimum requirements for consultation as outlined in National Planning Legislation and relevant policy and guidance including but not limited to Birmingham City Council's Registration Manual and the statement of community involvement. The SCI outlines this approach. 	<p>continue to seek ways in which consultation and engagement can be improved corporately as well as for planning decisions.</p>	
Organisation comment on beheard	Yes	<ul style="list-style-type: none"> Environmental considerations should feature for each proposal 	<ul style="list-style-type: none"> Environment and sustainability are important factors which are central to national and local planning policy. The adopted Birmingham Development Plan, against which planning applications are assessed, contains key policies in relation to the environment and sustainability. 	<ul style="list-style-type: none"> No further action 	SCI/014/6
Organisation comment on beheard	Yes	<ul style="list-style-type: none"> Potentially CIL can be very beneficial to community aspirations. However in the case of Langley / RSCTC its strategic application has been very limited. CIL is an important enabler and so should be used as such. 	<ul style="list-style-type: none"> Changes have been made to reporting to ensure the reports accurately reflect which funds are available, and should changes be proposed to existing S106 agreements, these will be taken to Planning Committee before any amendments are made. Whilst continuing to provide the above, the issue is not something which is within the remit of the Statement of Community Involvement but can be looked at corporately to identify possible improvements. 	<ul style="list-style-type: none"> The City Council will continue to seek ways in which consultation and engagement can be improved corporately as well as for planning decisions. 	SCI/015/6
Organisation comments on beheard	Yes	<ul style="list-style-type: none"> No processes missing - only the staff to implement them 	<ul style="list-style-type: none"> Whilst Birmingham City Council has undergone budget cuts and resource constraints in recent years, it has always engaged with members of the public in accordance to at least the minimum standards required for consultation as outlined in National Planning Legislation and relevant 	<ul style="list-style-type: none"> No further action 	SCI/016/6

			policy and guidance including but not limited to Birmingham City Council's Registration Manual and the statement of community involvement. The SCI will ensure that this will continue or possibly seek to exceed these minimum standards wherever possible and insofar as resources allow.		
Organisation comments on beheard	Yes	<ul style="list-style-type: none"> Ensure all known political parties within potentially affected areas are aware of the consultations and all subsequent documents. Do not rely on social media for those who are unable to access or choose to avoid such media. 	<ul style="list-style-type: none"> There is sufficient flexibility in the document to tailor consultation to specific needs according to the circumstances and the appropriate needs of each target audience. Councillors, MPs and other elected members are already sent consultation correspondence for planning applications in their areas. Specific proposals and policies that affect certain areas may involve additional contact with Local Members and representatives. . 	<ul style="list-style-type: none"> The City Council will continue to seek ways in which consultation and engagement can be improved corporately as well as for planning decisions. 	SCI/017/6
Birmingham and Black Country Wildlife Trust Beheard	Yes	<ul style="list-style-type: none"> No 	<ul style="list-style-type: none"> Support welcomed 	<ul style="list-style-type: none"> No further action 	SCI/018/6

7/ Are there any processes or opportunities for engagement missing from Table 5 in relation to consultation on planning applications?

Response from:	Support Policy Approach?	Comments and Main Issues Raised	LPA Response	Action	Ref
Mr Linden Thomas on behalf of the Birmingham Law Society	Yes	<ul style="list-style-type: none"> Add to Key Stage 2 on Table 5 "Notification to Ward Councillors". 	<ul style="list-style-type: none"> The law society's recommendation about adding to Key Stage 2 on Table 5 "Notification to Ward Councillors is noted 	<ul style="list-style-type: none"> Add "Notification to Ward Councillors" to Key Stage 2 on Table 5 	SCI/002/7
Natural England	Yes	<ul style="list-style-type: none"> All planning consultations should be sent electronically to the central hub for their planning and development advisory service at consultations@naturalengland.org.uk 	<ul style="list-style-type: none"> Birmingham City Council thanks Natural England for its response and will ensure that its consultation details are updated accordingly 	<ul style="list-style-type: none"> Ensure correct contact details are added to the Consultation database. 	SCI/006/7
Individual comment on Beheard	Yes	<ul style="list-style-type: none"> None 	<ul style="list-style-type: none"> Support welcomed 	<ul style="list-style-type: none"> No further action 	SCI/008/7

Individual comment on Beheard	Yes	<ul style="list-style-type: none"> • How do you educate the public on the difference between material and non-material responses? Responses often include the latter • 5.10 - all comments should be made available online - you shouldn't have to ask in writing. • Table 5/2 - 'The application will be available to view on the City Council's website'. However the search function is hard to use unless you know what you are looking for. • You should provide an online user-friendly weekly list of applications, by Ward. I note that you currently do this but: It requires a download for each week. This is clumsy. There should be an online list. This list should be for each Ward, added to weekly by date, so that it can be scanned. Without this the lists are difficult to search. • The application numbers given should be a live link to the application details • Also consider social media. Why isn't there a Twitter feed/RSS feed for applications, by Ward? People can't comment if they are not aware. 	<ul style="list-style-type: none"> • Comments are noted and welcomed • In-line with the General Data Protection Regulations, a written request must be made to access information which may sometimes contain sensitive data • The recommendations about providing an online user-friendly list of applications, improving the search functions of the City Councils' website, application numbers acting as a live link to the application details and using social media (including twitter and RSS feeds) are very useful and will be given consideration. 	<ul style="list-style-type: none"> • Ensure that the recommendations about providing an online user-friendly list of applications, improving the search functions of the City Councils' website, application numbers acting as a live link to the application details and using social media (including twitter and RSS feeds) have been passed onto the registrations team and communications team for review . 	SCI/009/3
Individual comment on Beheard	Yes	<ul style="list-style-type: none"> • None 	<ul style="list-style-type: none"> • Support welcomed 	<ul style="list-style-type: none"> • No further action 	SCI/010/7
Individual comment on Beheard	Yes	<ul style="list-style-type: none"> • Concerns are in relation to processes. Where the information is placed, timing. How consultation is done 	<ul style="list-style-type: none"> • Birmingham City Council will always engage with citizens across the city in accordance with the minimum requirements for consultation as outlined in National Planning Legislation and relevant policy and guidance including but not limited to Birmingham City Council's Registration Manual and the statement of community involvement. These standards apply universally and to the same standards across the whole city, and Birmingham City Council always applies these policies equally across 	<ul style="list-style-type: none"> • The City Council will continue to seek ways in which consultation and engagement can be improved corporately as well as for planning decisions. 	SCI/011/7

			the city. Birmingham City Council will seek to exceed minimum standards wherever possible and insofar as resources allow.		
Individual comment on Beheard	Yes	<ul style="list-style-type: none"> There are many other opportunities for engagement in the preparation of Neighbourhood Plans 	<ul style="list-style-type: none"> Support welcomed 	<ul style="list-style-type: none"> No further action 	SCI/012/7
Group comment on beheard	Yes	<ul style="list-style-type: none"> Again, a more transparent arrangement with the development of capacity to support planning consultation through a CRSE and a community planning qualification underpinned by the HE sector and CIL/S106 /Social Value remittances would provide the additional capacity to deliver innovative planning outcomes. 	<ul style="list-style-type: none"> Noted. 	<ul style="list-style-type: none"> The City Council will continue to seek ways in which consultation and engagement can be improved corporately as well as for planning decisions. 	SCI/013/7
Organisation comment on beheard	Yes	<ul style="list-style-type: none"> Environmental considerations should feature for each proposal 	<ul style="list-style-type: none"> Environment and sustainability are important factors which are central to national and local planning policy. The adopted Birmingham Development Plan, against which planning applications are assessed, contains key policies in relation to the environment and sustainability. 	<ul style="list-style-type: none"> No further action 	SCI/014/7
Organisation comment on beheard	Yes	<ul style="list-style-type: none"> Same issues apply re Planning Application consultations. To be meaningful especially for large impactful development need to be baselined / related to Committee Plan expectations / i.e. no surprises. Mixed tenure, multigenerational housing, sustainable design. Lower reliance on petrol, greater reliance on public movement / EV pooling etc. Formal processes tend to favour the powerful development lobby. Communities are relatively unskilled, perplexed and easily out manoeuvred - the unitary Planning Authority's first duty is to protect their interests. 	<ul style="list-style-type: none"> Comments noted. 	<ul style="list-style-type: none"> No further action 	SCI/015/7
Organisation comments on beheard	Yes	<ul style="list-style-type: none"> Yes. One of the items missing is disclosure of the names of applicants in planning applications. 	<ul style="list-style-type: none"> In relation to the details of applicants being redacted on planning applications, this is a legal requirement 	<ul style="list-style-type: none"> No further action 	SCI/016/7

		<ul style="list-style-type: none"> Without sufficient resources for the enforcement of planning decisions, the whole system is in danger of being undermined. So you can go through the correct procedures of consultation - but without transparency of applicants and enforcement of decisions we fear for the future of the planning system. 	<p>of the General Data Protection Regulations.</p> <ul style="list-style-type: none"> Birmingham City Council has an active planning Enforcement team whose responsibility is to ensure that developments within the city are carried out according to planning permission and any relevant conditions where required 		
Organisation comments on beheard	Yes	<ul style="list-style-type: none"> No specific reference to the impact of the development on wider systems (e.g. impact on primary care resilience and capacity to support demands) Can consultation with primary care networks and primary care in local areas be made so that the CCG and service providers can collaborate to ensure there is adequate service provision, infrastructure and workforce to meet the needs of the expanding community. Alignment to the STP estates workbook and opportunities for Section 106 investment could be considered as part of the assessment and decision making process. 	<ul style="list-style-type: none"> In terms of engagement, Birmingham City Council will ensure that the CCG is consulted on relevant planning applications. 	<ul style="list-style-type: none"> The City Council will continue to seek ways in which consultation and engagement can be improved corporately for planning decisions including the engagement of the CCG for major planning applications. 	SCI/017/7
Organisation comments on beheard	Yes	<ul style="list-style-type: none"> Add to Key Stage 2 on Table 5 "Notification to Ward Councillors". 	<ul style="list-style-type: none"> The recommendation about adding to Key Stage 2 on Table 5 "Notification to Ward Councillors has been noted 	<ul style="list-style-type: none"> Add the wording "Notification to Ward Councillors" to Key Stage 2 on Table 5 	SCI/018/7
Birmingham and Black Country Wildlife Trust Beheard	Yes	<ul style="list-style-type: none"> The Birmingham and Black Country Wildlife Trust would seek to be included within the list of consultees for all planning applications, where development will directly affect a statutory or non-statutorily protected site or will be situated in close proximity to the development. As a consultee, we would seek to be included within all stages of the planning process from pre-application through to assisting with reserved matters and conditions. In terms of Table 5, we would seek for 	<ul style="list-style-type: none"> If any pre-application directly impacts upon wildlife, nature or other natural features, the city Ecologist and Tree Officer will be consulted. Their advice will take into account any advice and guidance provided by the Birmingham and Black Country Wildlife Trust. 	<ul style="list-style-type: none"> The City Council will continue to seek ways in which consultation and engagement can be improved corporately as well as for planning decisions. 	SCI/019/7

		the pre-application process section to be included within the table, to cover the opportunity for engagements for this stage.			
Other Comments					
Response from:	Support Policy Approach?	Comments and Main Issues Raised	LPA Response	Action	Ref
Mr David Treadwell on behalf of Acocks Green Neighbourhood Forum and AGVP	N/A	<ul style="list-style-type: none"> There are concerns relating to the apparent loss of public space or public rights of way, particularly since large scale redevelopments seen mainly in the City Centre and other related areas Many of these spaces are seemingly becoming privately owned public squares, large areas, thoroughfares that appear to be in public ownership, but in fact, are owned and controlled by developers and their private backers These are not subject to ordinary local authority bylaws, but rather governed by restrictions drawn up by the landowners and usually enforced by private security companies. Transferring public rights and privileges to private interests. 	<ul style="list-style-type: none"> Planning applications will be determined against the City Council's Development Plan which contains policies in relation to the loss of open space and green infrastructure 	<ul style="list-style-type: none"> No further action 	SCI/001/8
Shabana Mahmood MP on behalf of constituents and community groups	N/A	<ul style="list-style-type: none"> One of the leading concerns raised by residents is the management of the development process. MPs' are regularly asked by constituents to make representations on their behalf against planning applications as they feel the planning system lacks transparency, is stacked against them and that the consultation process is not about seeking their views but rather rubber-stamping decisions that have already been made. The City Council should adopt a comprehensive and transparent 	<ul style="list-style-type: none"> The review of the Statement of Community Involvement helps to set the standard for consultation and engagement to ensure a consistent approach across the whole city and across all communities. If necessary the process can be tailored to exceed minimum standards and use best practice to ensure higher standards where resources allow. The SCI is being strengthened to emphasise the need to provide greater weight to those with protected characteristics as defined by the 	<ul style="list-style-type: none"> The City Council will continue to seek ways in which consultation and engagement can be improved corporately as well as for planning decisions in consultation with the Local Government Association and the Planning Advisory Service to ensure best practice. References to be 	SCI/002/8

		<p>consultation process across all parts of Birmingham, especially where residents already struggle to access and engage with City Council services including the most vulnerable socioeconomic groups. In the past the City Council has not necessarily treated the consultation process with the same consistency and due care and attention across the whole city.</p> <ul style="list-style-type: none"> • The City Council could possibly consider <ul style="list-style-type: none"> • implementing rules on the appropriate display of notices • introducing rules for using plain language • adequate signposting of key proposals within development plans to those communities who will be particularly affected. • In order to protect the communities most vulnerable to gentrification and social change in our city, the Council must consider including a statement protecting diverse communities in the aims of the SCI. • The City Council should consider liaising with representatives from the Local Government Association on best practice for consultation and seek to present the gold standard for an SCI and consultation • By using best practice and holding its planning applications and plan-making consultations to a much higher standard than the legal minimum, the City Council could avoid many of the process pitfalls encountered • The City Council should continue to develop its planning and consultation process by engaging with residents, businesses, elected representatives and special interest groups across the city. 	<p>Equality Act 2010 which includes protecting the interests of the most vulnerable groups and communities.</p> <ul style="list-style-type: none"> • Birmingham City Council will continue to develop its planning and consultation process by engaging with a wide variety of both internal and external stakeholders including but not limited to residents, businesses, elected representatives and special interest groups across the city and in neighbouring constituencies where this will benefit the city and its neighbours. 	<p>added where appropriate to emphasise the need to provide greater weight to protecting the interests of vulnerable communities and those groups with protected characteristics to comply with and have regard to the Equality Act 2010.</p> <ul style="list-style-type: none"> • The SCI will be regularly reviewed and updated when deemed necessary to ensure best practice and continual improvement. 	
--	--	---	---	---	--

Canals & Rivers Trust	N/A	<ul style="list-style-type: none"> The Trust notes and welcomes the commitment to keep the SCI under review and to monitor the effectiveness of the SCI The appropriateness of the first monitoring indicator set out in paragraph 6.2 is questioned which states that “100% of decisions in line with statutory consultee advice on major applications” because it is not uncommon for statutory consultees to have conflicting views on proposals and the role of the planner is to balance these material considerations when determining planning application. It is also unclear as to how the first monitoring indicator set out in paragraph 6.2 measures the effectiveness of the SCI. Further consideration should be given to the proposed indicators which could perhaps link back to the stated aims of the SCI 	<ul style="list-style-type: none"> The Indicators have been reviewed in light of the comments made. 	<ul style="list-style-type: none"> Monitoring indicators have been altered to better reflect the stated aims of the SCI. The SCI will be regularly reviewed in the City Council’s AMR and updated when deemed necessary to ensure best practice and continual improvement. 	SCI/004/8
Natural England	N/A	<ul style="list-style-type: none"> We regret that we are unable to comment, in detail on individual Statements of Community Involvement. Information on the services offered by Natural England including advice on how to consult them can be found at https://www.gov.uk/guidance/protect-d-species-how-to-review-planning-applications 	<ul style="list-style-type: none"> Noted. 	<ul style="list-style-type: none"> No further action required 	SCI/006/8
Network Rail	N/A	<ul style="list-style-type: none"> Network Rail is a statutory consultee for any planning applications within 10 metres of relevant railway (as the Rail Infrastructure Managers for the railway, set out in Article 16 of the Development Management Procedure Order) and for any development likely to result in a material increase in the volume or a material change in the character of traffic using a level 	<ul style="list-style-type: none"> Noted. 	<ul style="list-style-type: none"> No further action required 	SCI/007/8

		<p>crossing over a railway (as the Rail Network Operators, set out in Schedule 4 (J) of the Development Management Procedure Order).</p> <ul style="list-style-type: none"> • Network Rail is also a statutory undertaker responsible for maintaining and operating the railway infrastructure and associated estate. It owns, operates and develops the main rail network. • Network Rail aims to protect and enhance the railway infrastructure, therefore any proposed development which is in close proximity to the railway line or could potentially affect Network Rail's specific land interests will need to be carefully considered. 			
Access Birmingham – Attendance at meeting held 20 th May 2019	N/A	<ul style="list-style-type: none"> • Access Birmingham receive lists of planning applications and provide comments on larger applications concerning large housing developments, public realm developments, large public use buildings and community facilities. • As a group they meet regularly but would welcome attendance from planning officers when discussing particular developments or new documents of relevance 	<ul style="list-style-type: none"> • Noted. The City Council will continue to engage with Access Birmingham and attend meetings at the Group's request if appropriate and where resources allow. 	<ul style="list-style-type: none"> • No further action 	SCI/020/8
Comments received from Use-IT/ REMIX Project following Participatory Meeting on 24 April 2019	N/A	<ul style="list-style-type: none"> • Consultation periods need to be sufficient to give communities enough time to be meaningfully engaged. • Consultations need to allow for the co-design of solutions with communities, businesses, groups, etc. and not just a “yes/no” exercise. • The SCI needs to explain how a community can set up a Neighbourhood Forum to start up a neighbourhood plan. • The document doesn't explain who has access to CIL and what it means for the residents living in the area. 	<ul style="list-style-type: none"> • Birmingham City Council will always engage with members of the public on planning applications in accordance with the Development Management Procedure Order and the SCI. Birmingham City Council will seek to exceed these minimum standards wherever resources allow. The City Council will continue to seek more effective ways of publicising and consulting on planning applications without increasing the limited budgets it has to carry this out. • The SCI emphasises greater ‘frontloading’ and early involvement to ensure that future policies and 	<ul style="list-style-type: none"> • The City Council will continue to seek ways in which consultation and engagement can be improved corporately as well as for planning decisions in consultation with the Local Government Association and the Planning Advisory Service to ensure best practice. • The frontloading of community involvement will have 	SCI/021/8

			<p>decisions are made with appropriate engagement and buy in from local communities as resources permit</p> <ul style="list-style-type: none"> • The SCI explains the requirements for Community Involvement in the Neighbourhood Plan process. Assistance in setting up a Neighbourhood forum can be found at the Neighbourhood Planning website https://neighbourhoodplanning.org • All CIL funded projects should support the growth of Birmingham, as outlined within the Birmingham Development Plan are identified in the Infrastructure Delivery Plan. (IDP) The IDP, rather than the SCI is the vehicle for how stakeholders can identify projects eligible for CIL funding going forward 	<p>increased emphasis within the final version of the document.</p>	
<p>Comments received from general public at Eat, Make Play event at Edgbaston Reservoir on 13 July 2019</p>	N/A	<ul style="list-style-type: none"> • Documents need to be written in plain English to ensure everyone understands • Need to engage with people and communities much earlier in the process before proposals are identified. Hold regular discussions with communities at events and listen to concerns • Interactive events are a good way to engage with people 	<ul style="list-style-type: none"> • Comments noted regarding plain English. • The SCI emphasises greater 'frontloading' and early involvement to ensure that future policies and decisions are made with appropriate engagement and buy in from local communities as resources permit • Interactive events are part of a number of ways in which the City Council can engage with people. The City Council will continue to seek more effective ways of publicising and consulting on planning applications without increasing the limited budgets it has to carry this out. 	<ul style="list-style-type: none"> • Emphasise need for plain English in correspondence as a requirement within the Statement of Community Involvement • The frontloading of community involvement will have increased emphasis within the final version of the document. The City Council will continue to seek ways in which consultation and engagement can be improved corporately as well as for planning decisions in consultation with the Local Government Association and the Planning Advisory Service to ensure best practice. 	SCI/022/8

<p>Birmingham City Council – Planning Committee. Comments made at Committee Meeting held on 4th July 2019.</p>	<p>N/A</p>	<ul style="list-style-type: none"> • The Statement of Community Involvement (SCI) should be more easily accessible on the City Council's website. • There was a need to revamp the planning section of the City Council's website to explain how the planning process worked to ensure it was transparent and be clear as to how residents can have their say. • The SCI needs to be clear on who is to be consulted. • Printed versions of the SCI should be available in local community facilities such as libraries. • Developers needed to be encouraged to undertake pre-application consultation to the highest standard. • The Planning Committee should be involved in developing the SCI at all stages. 	<ul style="list-style-type: none"> • The City Council acknowledges that the SCI page of the website could be in a more prominent location and more clearly signposted. • The SCI does make it clear who is to be consulted on which part of the planning process and when. • Printed versions of the draft SCI were on display at all of Birmingham's Libraries during the consultation. Each Library will also receive a copy of the final adopted version of the SCI for reference purposes. • Pre-application discussions and consultation by developers is not mandatory. However the SCI emphasises the importance of such consultation by developers for large or locally significant development proposals. • Planning committee were invited to comment on the draft SCI and made valuable comments which is helping to shape the final version of the SCI. 	<ul style="list-style-type: none"> • The website pages are to be re-organised to ensure the SCI page and document are more prominently located on the City Council's website. • The final version of the SCI emphasises the importance of pre-application discussions and consultation with local communities as an important method of engagement for large or locally significant development proposals. • The City Council will continue to seek ways in which consultation and engagement can be improved corporately as well as for planning decisions with communities and groups 	<p>SCI/023/8</p>
---	------------	---	--	--	------------------

Appendix 2: Engagement Strategy for Statement of Community Involvement Consultation Document Draft June 2019

Introduction

Planning for development within the city is a key responsibility of Birmingham City Council, in order to meet the aspirations of local communities and to reach the City Council's overarching vision of creating and innovative, vibrant and sustainable city. The City Council's objective is to tackle the social, economic and environmental challenges facing the city today. The City Council is highly committed to listening to local people in shaping the city and the services that they received. Due to changes in legislation and planning policy, an updated Statement of Community Involvement (SCI) is sought to ensure that an up to date consultation and engagement strategy is adopted and applied.

Through the updated SCI, the City Council is looking to engage local communities, businesses and other interested parties in the planning process, to gain various viewpoints on how the City Council can make the system more efficient, transparent and inclusive. The City Council is committed to continue using its existing methods of engagement along with identifying new and innovative ways of reaching people more effectively to offer responsive services that meet local needs.

This document sets out the engagement strategy the City Council will adopt for the consultation on the revised Statement of Community Involvement, a document that will, in itself, set out how the City Council will consult in the preparation and review of planning policies and the consideration of planning applications. The SCI will identify the overarching methods in which local residents and interested parties will be encouraged to participate in the planning process.

This engagement strategy is formed of two main parts; the first sets out the City's requirements for consulting on the SCI through a review of local and national planning legislation. The strategy then identifies the key stakeholders and sets out the methods the City Council will adopt for consulting with these groups.

Consultation Policy Framework

The engagement strategy has been produced in line with the following national and local planning policy documents and legislation:

- Planning and Compulsory Purchase Act 2004 (as amended by the Planning Act 2008)
- Localism Act 2011
- The Town and Country Planning (Local Planning) (England) Regulations 2012
- Housing and Planning Act 2016

- Neighbourhood Planning Act 2017
- Government's Consultation Principles: Guidance 2018
- National Planning Policy Framework 2019

The SCI is a requirement of national planning legislation and its review has been triggered by changes to policy over the years. The consultation for the preparation of an updated SCI in Birmingham adheres to the guidance set out in government legislation, required to reflect the changes in national and local policy and to reflect the new communications that have evolved over the last 10 years since the first SCI was adopted in 2008. It is a legal/statutory obligation for local authorities to demonstrate that they are promoting public participation and adopting methods to ensure the voices of local residents and businesses are heard throughout the planning process.

Subsequently, this legislation requires the City Council to prepare a statement for how they will be involving those with an interest in development, setting out the standards for publicity on consultation on planning applications and plan-making.

The duty to prepare an updated SCI arises from the Planning and Compulsory Purchase Act 2004 (section 18) as amended by the Planning Act 2008, the Localism Act 2011 and the Neighbourhood Planning Act 2017.

Section 18 of the Planning and Purchase Act 2004 requires local planning authorities to produce a Statement of Community Involvement, which explains how they will engage local communities and other interested parties in producing their local development plans and determining planning applications.

The Town and Country Planning (Local Planning) (England) Regulations 2012 sets out statutory requirements that Local Authorities must comply with.

The updated SCI is guided by the Government's Consultation Principles: Guidance (2018) which outlines how consultations should be conducted.

There is a clear emphasis within national policy that consultation should begin at the very start of the preparation of any policy documents and communities should be given ample chance to comment on any form of development taking place within the city. Legislation states that early and consistent community involvement should be encouraged by Local Planning Authorities and should involve consulting key partners, including the local community.

The City Council will ensure that a wide and relevant audience is consulted, which will entail informing communities about emerging policies and specific development proposals along with enabling communities to put forward their ideas in shaping the area in which they live in.

Comments made should be acknowledged in the preparation of the document, and a document should be published for a statutory consultation period, being made widely available in public places, online and advertised in newspapers. Any feedback which is received by any bodies should then form part of the 'pre-production work' whereby information, issues and evidence gathered should be considered in the development of any plan or document that the City Council produces.

The final adopted SCI should be produced considering the comments made during the consultation process. The adopted SCI should be widely available to the general public, in public places and available online, and those who asked to be notified of the adoption of the document should be written to.

Engagement Strategy

In accordance with the Regulations, the Local Authority is required to consult relevant bodies at various stages during the planning process. The regulations outline Specific Consultation Bodies that must be consulted, in addition to the other groups outlined in the NPPF, referred to as 'General' consultation bodies. Subsequently, a consultation database is active and utilised by the Planning Department which lists the Specific Consultation Bodies, as outlined in the Regulation, and a list of General Consultation Bodies which have been included because the City Council considers them to be of great importance to the development of any plan.

Early Engagement

Where possible, the City Council has aimed to engage stakeholders in the production of the updated SCI from the outset to create a collaborative approach to this new draft document.

Consideration is given to ensure that this document reaches all audiences in a variety of ways, with officers identifying target groups who are under-represented to engage them in formulating the consultation strategy and learning the best ways to consult positively in the future.

Early engagement has occurred where BCC Officers have attended meetings with local stakeholders, including Access Birmingham and Project USE-IT, and it is noted that attending meetings with community groups is something that will be encouraged, and will continue until the end of the formal consultation stage.

Formal Consultation

Birmingham City Council is looking to invite comments on the draft SCI as part of a statutory formal consultation from 3rd June 2019 and will run for a 12 week period until 6th September 2019.

The City Council will communicate this document in a plethora of ways that would be suitable to meet the requirements of all audiences. The document will be able to be viewed on the City Council website and hard copies will be available to view during

normal operating hours at the Planning and Development offices or local libraries. In addition to these methods, requests for alternative formats will also be made accessible on a case by case basis, including large print, typetalk and various languages, to meet the needs of different people and groups where possible and where resources permit.

There will be a varying degree to which individuals will be able to get involved, with methods to inform the consultation to include:

- Publication on the Birmingham City Council website
- Be Heard
- Press and social media publications/advertisements
- Briefing sessions and meetings
- Officer advice and assistance over the telephone, e-mail and post

Next Steps

At the end of the consultation period, all responses will be analysed and will be taken into account and used to prepare the final version of the SCI which will then be formally adopted by Birmingham City Council.

Appendix 1: Engagement strategy

Consultation Type	Group/ Organisation	Stage	Method of Consultation	Comments
Specific	Local Authorities	Formal	Email/ Letter/ Meeting	Inform neighbouring LPAs of the formal consultation period.
Specific	Resident Associations/ Neighbourhood Forums	Early/ Formal	Email/ Letter/ Meeting	Inform groups of the formal consultation period and provide opportunity for individual meetings, if required.
Specific and General	Environment	Formal	Email/ Letter/ Meeting	Inform groups of the formal consultation period and provide opportunity for individual meetings, if required.
Specific	Government	Early/ Formal	Meeting/ Briefing	Early consultation includes briefings with Leader and Cabinet Members as requested.
Specific and General	Health	Formal	Email/ Letter/ Meeting	Inform groups of the formal consultation period and provide opportunity for individual meetings, if required.
Specific and General	Transport/ Access	Formal	Email/ Letter/ Meeting	Inform groups of the formal consultation period and provide opportunity for individual meetings, if required. Meetings organised with organisations such as Access Birmingham.
General	Civic	Formal	Email/ Letter	Inform groups of the formal consultation period and encourage submission of comments.
General	Developers	Early/ Formal	Email/ Letter/ Meeting	City wide developers shall be informed of the formal consultation period and encouraged to submit their comments.
General	Education	Formal	Email/ Letter/ Meeting	Inform groups of the formal consultation period and provide opportunity for individual meetings, if required.
General	Equalities	Early/	Email/ Letter/	BCC Officers to attend meetings with individual groups upon

		Formal	Meeting	request. Groups are to be informed of the formal consultation period and invited to further meetings, if required. Internal meetings to ensure compliance.
General	Housing	Formal	Email/ Letter/ Meeting	Inform groups of the formal consultation period and provide opportunity for individual meetings, if required.
General	Landowners	Early/ Formal	Email/ Letter/ Meeting	City wide landowners shall be informed of the formal consultation period and encouraged to submit their comments.
General	Religious bodies	Formal	Email/ Letter/ Meeting	Inform groups of the formal consultation period and provide opportunity for individual meetings, if required.

Appendix 2: Consultation events to date

Date	Consultation	Who was involved?
22 nd March 2019	Inclusive Growth Directorate Management Team	Internal - BCC Planning Officers, Director, Assistant Directors
8 th April 2019	Corporate Management Team	Internal - BCC Planning Officers, Corporate Directors and Chief Executive
23 rd April 2019	Executive Management Team	Internal - BCC Planning Officers, Corporate Directors and Leader of the Council
14 th May 2019	Birmingham City Council Cabinet	Internal - Leader and Cabinet Members
20 th May 2019	Presentation and discussion with Access Birmingham	External - BCC Officers, Access Birmingham Group members
End of May 2019	Equality and inclusion assessment	BCC Planning Officers, Equality Officer representatives
4 th July 2019	Presentation and consultation discussion with Birmingham City Council Planning Committee.	BCC Planning Officers, Planning Committee Members

