SHEFFIELD

Statement of Community Involvement

Wednesday, 29 July, 2020





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Please Note: When using electronic versions of this Statement, hyperlinks are shown in blue text. Hyperlinks to internet addresses are displayed in blue and are underlined. Hyperlinks to other locations within this document described as internal links are displayed in blue but are not underlined. 'Internal links' either, connect to the Glossary in Appendix 4; or, connect to named locations within the document. In Microsoft Word versions of this statement, holding your mouse over hyperlinks will display additional information or relevant web addresses in screen tips.

1. Introduction

What is the Statement of Community Involvement?

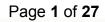
1.1 We place great importance on effective community involvement and are committed to public engagement when preparing planning policy. We have long established procedures designed to allow the expression of your views on planning applications. This Statement of Community Involvement (SCI) reviews how we will involve communities, businesses and organisations in the preparation of local planning policies (Chapter 2) and planning application decisions (Chapter 3).

Why Do We Need a New SCI?

- 1.2 The previous version was adopted in 2014 and this review is necessary for the following reasons:
 - a. To adhere to and reflect national planning policy and planning legislation.
 - b. **To review our practices** due to budget pressures while continuing to consult as efficiently as possible.
 - c. To promote new and increasingly standard electronic communication and social media.
 - d. To account for changes to how we deliver services.

Our Approach

- 1.3 The Fairness Commission's report published in 2013 highlighted stark inequalities in Sheffield both between places and between different groups of people. Everyone should get a fair chance to succeed and some people and communities need extra help to reach their full potential, especially when faced with multiple layers of deprivation. It is therefore vital we uphold the following principles of community involvement and that they are reflected in the methods of consultation described throughout this SCI:
 - A culture of engagement: Encouraging involvement in planning.
 - 'Early involvement' or 'front loading': Involving communities by consulting at the earliest opportunity.
 - **Continuing involvement**: Involvement throughout the planning process.
 - Reaching out: Encouraging involvement appropriate to people's experience and needs.
 - **Fit for purpose:** Consultation arrangements appropriate to the proposal being considered, while being realistic about available resources.
 - **Clarity:** Providing a clear planning process with timetables for production or review of local development documents and planning decisions.
- 1.4 There are benefits to following the above principles. First, it will lead to outcomes that better reflect the communities' views, aspirations and needs by giving them the opportunity to influence decision-making. Second, it improves the quality and efficiency of planning decisions, by drawing on local knowledge and encouraging consensus.



Personal Information on the Internet

- 1.5 We have reviewed national best practice advice on the way we handle your personal information: when you make comments during consultation on planning policy documents; or, when we publish application and enforcement information on our web site. This has implications for personal information that are set out in guidance on our website (scroll down to and click on the 'Planning' dropdown).
- 1.6 A balance is always struck between ensuring that consultation on planning policy documents, or during the planning application process is transparent and open, minimising the risk of possible undue influence being applied or corruption, and protecting individuals from possible identity theft or being deterred from making representations. Exceptional cases for confidentiality will be considered.

Consultation during Local or National Emergencies

- 1.7 In the case of a local, national or international emergency, such as the floods in 2007, or, the pandemic caused by the Corona virus in February 2020; there may be disruption to the day to day running of the Planning Service. There could be disruptions to either the processing of planning applications, or the preparation of planning policy documents. In such an event, it may not be possible to undertake the comprehensive consultation measures or processes set out in this Statement.
- 1.8 It is not possible to say how engagement in planning matters might be affected as each emergency will be unique. In such events we will always endeavour to maintain normal levels of service as set out in this Statement. However, it may be necessary for us to temporarily consider reductions in services, imposition of service restrictions, temporarily cancelling planning committee meetings, or even postponing pre-planned consultations in the light of Sheffield City Council or Government advice during such emergencies.
- 1.9 In those events, scheduled consultations on planning policies or consultations on planning applications will be carried out electronically or digitally (including use of online questionnaires or social media publicity), unless we announce otherwise on our website.
- 1.10 We will make every attempt to resume normal levels of service as soon as possible. Also, we'll attempt to notify those affected by any temporary changes necessary to the services and procedures set out in this Statement. This will be done using the best contact method available at that time, if at all possible.



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2. Consultations on Planning Policy Documents

Methods of Consultation

- 2.1 We use a range of methods when consulting on draft planning policy documents as outlined in paragraphs a) to I) below. The methods chosen will always be proportionate to the extent of the audience we must reach; and the relative importance of the document on which we are consulting. In addition, we will consider using a range of alternative options (listed in Table 1 and Table 2) to make consultation as inclusive as possible. The methods used will include:
 - a) **Contacting Registered contacts:** we contact approximately, 1,300 organisations and individuals through our consultee database, during local planning policy document consultations. Our database portal is hosted by Objective. To be included on the register, go to:

Sheffield Plan Consultation Portal

and click on Login Register, then follow the on-screen instructions to add your details.

- b) **Online availability:** All Planning Policy consultations will be available through the Council's <u>Sheffield Consultation Hub</u> website to which you can sign-up.
- c) Hard Copy availability: Consultation documents will be available for inspection or sale from our principal office¹ and at other accessible locations across the city as appropriate². Alternative formats will be made available on request.
- d) **Media:** Through press releases or special features, both traditional e.g., newspapers, and "new media" will be used to publicise a consultation ensuring it reaches beyond registered consultees. Our choice of media will be flexible enough to take advantage of new technology.
- e) **Press releases:** Will continue to be issued and, if possible, will include special features in local newspapers and radio shows.
- f) Posters or newsletters: On our website or via other electronic or social media, can be used to publicise consultations e.g., by using Twitter and our email alert service.
- g) **Public exhibitions:** raise the profile of proposals and are most useful when they contain a strong visual element.
- h) A City Conference: with a wide range of stakeholders and workshops has proved effective in previous consultations.
- i) **Public meetings:** Provide the opportunity to raise questions, concerns and debate with officers on particular issues. Public meetings are generally hosted, where appropriate, by an existing community group⁴ who have an interest in the document's content.

<u>Local Area Partnerships</u> do not have the resources that the previous Community Assemblies or Area Panels were able to lend to planning consultations, but will be kept involved.



Currently First Point at Howden House on Union Street

e.g., libraries, First Point Centres, or other centrally located, publicly accessible buildings

³ "New media" refers to on-demand access to content anytime, anywhere, on any digital device, as well as interactive user feedback, and creative participation.

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- j) Questionnaires: Often combined with a public exhibition, but are used with caution. Well-designed questionnaires can keep comments focused on the scope of the consultation, generating useful feedback.
- k) Events: Exhibitions, public meetings, drop-in sessions and conferences are the most direct method of consultation, requiring the most resources to implement. There are two options available to us and in each case, we will choose the option allowing us to maximise the affected community's involvement while making the most efficient use of our available resources.

We will either:

- target the location of events⁵ for proposals that affect a specific site/ confined area or specialised topic; or
- locate events in accessible central locations⁶ for proposals that involve issues with a city-wide or district wide focus.
- I) Drop-in sessions: Combine the advantages of exhibitions and public meetings. They are less formal than public meetings and encourage a wider range of attendees and face to face discussion.
- 2.2 When consulting on a planning policy document, we will detail: its purpose; where any consultation documents are available to be viewed or downloaded; the consultation period; how comments can be made; and, any associated consultation events.

Ensuring Equality

- 2.3 We recognise that some people face additional barriers and constraints. We will assist people who are willing to become involved, whilst recognising their need for differing levels of involvement (with some not wishing to be involved at all).
- 2.4 We have a Public Sector Duty to pay due regard to the need to eliminate discrimination, advance equality of opportunity and foster good relations between different people when executing their activities⁷. To ensure this, we will:
 - a) Liaise on who and how to consult, with expert advisors⁸. Particularly on the way we engage with individuals and groups having a specific protected characteristic⁹.
 - b) Consider detailed matters such as the timing and type of venue, to ensure events feel safe and are accessible;
 - c) Make all planning policy documents available for inspection, free at our principal office and other public information points across the city as appropriate.

i.e., hold events that are specifically aimed at members of the public/organisations most affected by proposals and located where most change is proposed. For example, Green Belt review and allocations proposed on Greenfield sites.

Locations can be either within the district affected, or in the City Centre. Locations must have good access to public transport and allow event times to be adjusted to maximise staffing and attendance.

Figurality Act 2010, Public Sector Equality Duty, Part 11, Chapter 1, Section 149 (1), page 96.

These include our Elections, Equalities and Involvement Team, Staff Equality and Inclusion Network, Equality Hub Networks, Access Officers and Local Area Partnerships.

Particular personal characteristics are protected from acts of discrimination by the Equalities Act 2010. Protected Characteristics are defined in the Equality Act 2010 (c. 15) Part 2 — Equality: Key Concepts, Chapter 1, Protected Characteristics, as age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; and sexual orientation.

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- d) **Produce planning policy documents for consultation in plain language**, using clear print standards and in a variety of formats. Paper copies (including large print) and electronic versions will be available on request.
- e) **Produce formats required as reasonable adjustments**, such as braille or audio will be made available. Versions in languages other than English will be provided on request wherever practicable and reasonable.
- f) Consult and involve people from the city-wide Equality Hub Network and related groups/ organisations. For example, including the Access Liaison Group, FaithStar Foundation, Together Women's Project, Disability Sheffield, LGBT Sheffield and other relevant bodies, through our Consultation database and via the Equality Hub mailing list.

Planning Policy Documents and Consultation Stages

Local Plan

- 2.5 National guidance on plan making states that the development plan is at the heart of the planning system and that planning decisions must be taken in line with the development plan unless material considerations indicate otherwise. Plans set a vision and a framework for the future development of an area. They look toward addressing the community's housing, economic, community facilities and infrastructure needs and opportunities. Plans also form a basis for conserving and enhancing the natural and historic environment, mitigating and adapting to climate change, and achieving well designed places.¹⁰
- 2.6 National Policy¹¹ explains that the development plan can be contained within a joint or individual Local Plan. These can be produced by Local Planning Authorities working together, independently, or within a spatial development strategy produced by an elected mayor or combined authority where plan-making powers have been conferred.
- 2.7 We will independently produce Sheffield's Local Plan, called the 'Sheffield Plan' cover the period 2023-2038, which will become the development plan for Sheffield. It will set out the vision, objectives, strategic and non-strategic policies for the whole of the Sheffield administrative area except the part of the district within the Peak District National Park¹².
- 2.8 Its **strategic policies** will set out an overall strategy for the pattern, scale and quality of development while making sufficient provision for housing, employment, retail, leisure and other commercial development, infrastructure, community facilities, and conservation and enhancement of the natural, built and historic environments. They will also include policies designed to secure contribution towards mitigation of and adaption to the effects of climate change.
- 2.9 Its **non-strategic policies** set out more detailed policies for specific areas, neighbourhoods and types of development. This will include the local provision of infrastructure and community facilities, establishing design principles, conserving and enhancing the natural and historic environments, and other development

The Peak District National Park Authority is responsible for preparing the Local Plan for the national park. See Peak District National Park Local Development Framework Core Strategy (2011), and Development Management Policies (2019).



Gov.uk Guidance on Plan-making

National Planning Policy Framework, February 2019, Paragraph 17, Ministry of Housing, Communities and Local Government

management policies.

- 2.10 Allocated sites will be illustrated on a Policies Map which will form part of the Sheffield Plan.
- 2.11 Agreement has been reached, in principle, with the other South Yorkshire Unitary Authorities to produce a Joint Waste Local Plan. This will replace waste management policies in the Sheffield Core Strategy (2009) as well as the adopted Joint Barnsley, Doncaster & Rotherham Waste Plan (March 2012).
- 2.12 Once adopted, the Sheffield Plan will replace:
 - All the policies in the Sheffield Core Strategy (2009) except the following policies below):
 - o CS68 Waste Development Objectives;
 - CS69 Safeguarding Major Waste Facilities; and
 - CS70 Provision for Recycling and Composting.
 - All the saved policies in the Sheffield Unitary Development Plan (1998).

Involvement in Preparing the Local Plan

2.13 How we will involve people in the process of preparing the Sheffield Plan (see Figure 1) is summarised in Table 1. How you can get involved at each stage in the process is briefly explained below.

Figure 1: Local Plan Preparation Procedure



Stage 1: Preparation

• We will outline the main issues and options¹³ surrounding the Local Plan during public consultation held for a minimum of six weeks. Sheffield City Council publicly consulted on the Citywide Options for Growth in December 2015.

Stage 2: Draft Consultation

• We will seek views on options for both policies and site allocations during public consultation on a draft plan lasting for at least six weeks. It is your main opportunity to influence the Sheffield Plan's policies and proposals.

Stage 3: Publication

• Formal public consultation where you can make representations on the Publication version will last at least six weeks. This version takes on board

¹³

For example, examining options surrounding broader questions like: How many new homes and jobs will we need throughout the plan period; or, what are the options for accommodating forecasted population change in Sheffield?

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comments received during Draft Consultation. It provides the final opportunity for people, organisations or groups to formally make representations on the plan's policies prior to examination.

Stages 4 and 5: Examination and Adoption

- The Sheffield Plan, public responses and written statements are examined by the planning inspector at public examination. There may be further modifications published for consultation during examination, after which a report on the soundness of the Local Plan is issued by the Inspector.
- We will publicise the Inspector's Report.
- During the Adoption stage, the Inspector's report's recommendations are considered, necessary changes are made and Sheffield City Council adopts the Sheffield Plan. We will publish the adopted Sheffield Plan on our website.
- 2.14 We will follow the processes outlined in this Statement when consulting on Sheffield's development plan documents, unless those processes are superseded by statute. In that instance, our process will align with the most up-to-date statutory requirements.

Local Development Scheme

- 2.15 Local planning authorities are required by law¹⁴ to publish a Local Development Scheme (LDS) and to revise it when they consider it appropriate. The LDS must specify (among other matters) the documents that will comprise the Local Plan for their area. Sheffield's LDS explains what planning documents we intend to produce, their purpose and the timetable for producing them.
- 2.16 The previous LDS was published in July 2016, but a revised Local Development Scheme came into effect on 20 November 2019. It is available to download from the Emerging Draft Sheffield Plan webpage.
- 2.17 We will revise the LDS when considered appropriate. At that time, we will publish the revised scheme via the Emerging Draft Sheffield Plan webpage.

Supplementary Planning Documents

- 2.18 Supplementary Planning Documents (SPDs) build upon and add further detail to the policies in the Local Plan. They provide further guidance on the development of specific sites, or on particular issues, such as design or affordable housing. SPDs are capable of being material considerations in planning decisions but are not part of the development plan.
- 2.19 There is a process we must follow (see Figure 2) when preparing or updating an SPD. What we will do to consult people and organisations is summarised in Table
 2. Furthermore, the table outlines additional alternative options we will consider using during each consultation.





A Local Development Scheme is required under <u>section 15 of the Planning and Compulsory</u>

<u>Purchase Act 2004</u> (as amended by the Localism Act 2011, Section 111).

Figure 2: SPD preparation process



2.20 When adopting a new SPD or updating existing SPD we will:

Stage 1: Preparation

compile a Draft SPD document and supporting evidence;

Stage 2: Draft Consultation

 publish the Draft SPD for public consultation for a period of not less than 4 weeks from when the Draft SPD is first published;

Stage 3: Adoption/Approval

- Consider any comments received during Draft Consultation, making any necessary changes to the Draft SPD.
- We will then prepare an adoption statement, adopt the SPD as a Development Plan Document and publish it with the adoption statement on our website.
- 2.21 We don't have to produce SPDs, but we will if needed to provide more detail on policies in the Sheffield Plan. SPDs don't have as many procedures to follow as the Local Plan but we are still obliged to consult on them for a minimum of 4 weeks.

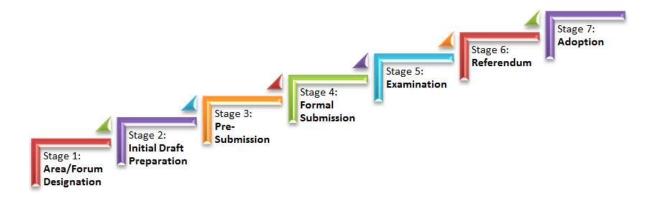
Neighbourhood Planning

- 2.22 The Government's Localism Act (2011) introduced Neighbourhood Planning, giving new rights and powers to neighbourhoods allowing them, if they so choose, to produce a plan shaping how their area should develop and grow.
- 2.23 Each neighbourhood plan is taken forward by the qualifying neighbourhood planning body (QNPB) representing that neighbourhood. Only QNPBs can undertake these tasks. QNPBs are: either existing parish or town councils; or where there is no parish, a designated neighbourhood forum.
- 2.24 We have a duty to provide advice and technical assistance to community groups engaging in neighbourhood planning particularly during the designation of their area or their neighbourhood forum. However, it is the QNPB's sole responsibility to engage with and consult their local community during the development of their neighbourhood plan, neighbourhood development order or community right to build order.
- 2.25 Nevertheless, there are parts of the neighbourhood planning process (see <u>Figure 3</u>) where we are required to undertake public consultation (i.e., at the area/forum designation and formal <u>submission</u> stages).





Figure 3: Consultation during the Neighbourhood Plan Preparation Process



2.26 Further information on neighbourhood planning in Sheffield is available on our website. That information includes progress on existing neighbourhood plans; details of how we will support parishes and forums producing a plan; and details of how we'll perform our other neighbourhood planning responsibilities. Those responsibilities include publicising neighbourhood area applications and holding a neighbourhood referendum towards the end of the process:

Sheffield.gov.uk - neighbourhood planning

Other Planning Policy Documents

2.27 Planning Briefs are site-specific and form a stepping stone between existing planning policies and the requirements of a planning application. They allow the opportunity for early consultation with residents and other stakeholders, providing a degree of certainty for developers, ultimately resulting in better development proposals. All Planning Briefs will be subject to a minimum 4 week consultation period.

Brownfield Register

- 2.28 The Housing and Planning Act (May 2016) introduced for each Local Planning Authority a statutory Brownfield Register and a new Permission in Principle (PiP) route to full planning permission. Sheffield's Brownfield Land Register provides upto-date and consistent information on sites that we consider appropriate for residential development having regard to the criteria in the regulations¹⁵.
- 2.29 We maintain Part 1 of Sheffield's Brownfield Register, which provides a comprehensive list of all brownfield sites suitable for housing development, both with and without planning permission. We review Part 1 each year in accordance with the regulations.
- 2.30 Part 2 of a Brownfield Register can be used to grant PiP to a sub-set of sites from Part 1. No sites are currently proposed for inclusion in Part 2 of Sheffield's Brownfield Register. You can view a map and list of brownfield sites in Part 1 of our brownfield register from the following webpage:
 - Sheffield.gov.uk Housing Land Sites.
- 2.31 We are not required to consult on sites proposed for inclusion in part 1 of the

first published on 21 December 2017 and was updated on 19 December 2018 as required by the regulations



regulation 4 of the Town and Country Planning (Brownfield Land Register) Regulations 2017

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register. If we decide to add sites from Part 1 to Part 2, we will undertake the following consultation, notification and publicity procedures in line with the regulations.¹⁷

We will:

- display a notice on a firm fixture, on or near the site in question. The
 notice will display our intention to enter the land into Part 2 of the Brownfield
 Register by giving not less than 21 days' notice; specify where and when you
 can inspect supporting evidence; state the date by which you can make
 representations; and explain how to make representations;
- publish our intention to enter the land into Part 2 of the Brownfield Register on our website at <u>Sheffield.gov.uk - Housing Land Sites</u>. Our website will provide details of how to make comments in accordance with the regulations;
- If the proposal is within a neighbourhood area, notify the relevant qualifying neighbourhood planning body (QNPB) of our intention to add the site to Part 2 of the Brownfield Land Register, where they have requested such notification and the site lies within the QNPB's area.

Community Infrastructure Levy

- 2.32 The Community Infrastructure Levy (CIL) is a planning charge, introduced by the Planning Act 2008. It is a tool for local authorities in England and Wales that helps deliver infrastructure supporting development in their area. Local authorities have to decide how the infrastructure needs of the development proposed will be met and how these will be paid for.
- 2.33 To that end, we have adopted a CIL and <u>provided a Supplementary Planning Document (SPD) on how CIL and planning obligations work together.</u>
- 2.34 Sheffield's CIL levy rates are clearly outlined in our CIL Charging Schedule, This charging schedule is not a planning policy document, but the levy rates are set in order to help implement planning policies and support development in the city. The Charging Schedule was approved in June 2015 and is available to download from our webpages. These approved rates are subject to an annual index that changes the amount that will be charged on 1 January each year. Details of the current index and charges are also provided on the CIL webpage. Our adopted charging schedule was prepared in accordance with the relevant regulations and involved three public consultations of 4 to 6 weeks. New CIL regulations have removed the need to prepare a preliminary charging schedule. The updated regulations now require one round of consultation on a draft charging schedule. You can also ask to be heard by the examiner during the draft charging schedule consultation, if you so wish.
- 2.35 By 31 December 2020 (and yearly after that), we will publish a statement of infrastructure projects we intend to fund using CIL in an infrastructure funding statement.

Involvement in updating the CIL Charging Schedule

2.36 When it becomes necessary to update the current CIL charging schedule, we will undertake public consultation on these documents in line with the relevant regulations.



We will:

- Formally publish a draft charging schedule alongside the appropriate available evidence on infrastructure costs, other funding sources and viability (<u>CIL regulation 16</u> as amended by the <u>2019 Regulations</u>).
- Consult on this draft charging schedule. The regulations do not specify for how long or how many times charging authorities should consult on the draft charging schedule. The expectation is that consultation will be for a minimum of 4 weeks. However, where only minor changes are proposed a shorter consultation period may be considered appropriate. Examiners must consider whether adequate time has been provided for consultation on a draft charging schedule, particularly for consultations of less than 4 weeks. In doing so, they will take into account the scale and complexity of the changes proposed. During the consultation period, any person may comment on the draft charging schedule, and may ask to be heard by the examiner if they wish (CIL regulation 21).
- Notify any person who makes representations in relation to a draft charging schedule and requests to be notified:
 - When the draft has been submitted for examination;
 - At publication of the examiner's recommendations; and
 - Following approval of the charging schedule by the charging authority¹⁸.
- Consider the comments received during consultation, making any
 necessary changes to the charging schedule. Government guidance advises
 that charging authorities should avoid making substantive changes to the draft
 charging schedule between publication and submission to the examiner, unless
 such changes are also consulted on.
- Prepare a 'statement of modifications' (as defined in regulation 11(1)), setting out any changes made to the draft charging schedule after publication.
 We'll also publicise the statement of modifications and notify all those invited to comment on the draft charging schedule that it's available.
- After the examiner reports his or her recommendations in writing to us as the
 charging authority, we will publish the examiner's report and consider its
 findings. The examiner will recommend that the draft charging schedule
 should either be; rejected, approved with specified modifications, or approved.
 The examiner must give reasons for his or her recommendations.
- If rejected, we'll consider submission of a revised schedule. If approved subject
 to modifications, we'll consider making the necessary modifications and
 adopting it; or if the recommendation is to approve it, we can adopt it by
 resolution of the full Council.
- Once adopted the updated CIL charging schedule and supporting documents will be published on our website.

What We Will Do

2.37 Table 1 below summarises for each stage of the Local plan's preparation, what we will do to publicly consult people and outlines some of the additional consultation options we will consider. The additional consultation options are considered in relation to the scale, type and location of proposed changes of each consultation,



- bearing in mind the resources available.
- 2.38 Table 2 summarises what we will do to consult people at each stage of preparing or updating this SCI, SPDs and Planning Briefs.
- 2.39 The principal of 'front loading' means that additional consultation options will be considered during the earlier stages of consultation. Each consultation will have a plan outlining the choice and extent of additional consultation options. Each Consultation Plan will be approved by the Head of Planning in consultation with the Cabinet Lead Member before being published.
- 2.40 As explained in paragraphs 1.7 to 1.10 above, in the case of a local, national or international emergency such as the pandemic caused by the Corona virus in February 2020; it may not be possible to undertake the comprehensive set of consultation measures or processes set out in Table 1 or Table 2.
- 2.41 In those rare events, it may be necessary for us to consider the option of postponing pre-planned planning policy document consultations in light of emerging Sheffield City Council or Government advice. To avoid delaying prescheduled consultations on the Local Plan (or other development plan documents) under those circumstances, we may opt for consultation by electronic or digital means only (including use of online questionnaires or social media publicity), unless we announce otherwise on our website. In those exceptional cases, we will publish our chosen consultation methods on our website prior to the scheduled event.





Table 1: Consulting on the Local Plan

Local Plan¹⁹ (including Sustainability and Equality Appraisal)

Local Plan (including Sustainability and Equality Appraisal)				
Stage	What we will do	Additional options (see paragraph 2.13 above)		
Issues and Options and Publication Stages.	 Consult for a minimum of 6 weeks; Notify Ward Members; Notify registered contacts (Appendix A); Make consultation documents available from our principal office²⁰; Publicise in locations across the city e.g. First Point centres and libraries; Make consultation documents available in alternative formats on request; Publicise and make consultation documents available on our website; Issue a press release. 	 Longer consultation period; Try to arrange special features in local newspapers and local radio; Notify neighbourhood publications; Publicise using posters or newsletters; Publicise as a news item on our website or via other electronic or social media methods e.g. Twitter; Public exhibitions, public meetings, drop-in sessions aimed primarily at residents; Meetings or workshops with representatives of businesses and other organisations; Questionnaire; City conference; Provide an online consultation tool for consultees and agents to make comments online; Provide an interactive online map; Consult with the City wide equality hub network. 		
Submission to the Secretary of State.	Following submission we will notify all of our registered contacts, and anyone else who requests to be notified, where and when the submission documents can be viewed.	• None		
Public Examination ²¹	At least 6 weeks before the examination starts we will: • Publish on our website the date, time and place where the examination is to be held, as well as the name of the person running the examination;	The Inspector and their Programme Officer are responsible for how the public examination is run.		

¹⁹ We will do the same for any other Development Plan Documents

At this stage the Local Plan is 'examined' by the Planning Inspectorate on whether it is 'sound' and has met all of the legal requirements. During the examination the inspector will hold a public hearing. The Inspector may suggest changes to the Local Plan and further consultation is normally required at that stage. Any representations made at that stage will be considered by the Inspector and not the local planning authority.



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Currently First Point at Howden House on Union Street and, for example, libraries

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Stage	What we will do	Additional options (see paragraph 2.13 above)	
	Notify anyone who has made a comment during the publication stage.		
Adoption	 Publish the adopted Local Plan alongside an adoption statement and other supporting documents on our website; Notify all registered contacts; Issue a press release. 	Publicise as a news item on our website or via other electronic or social media methods e.g. Twitter.	

Table 2: Consulting on SPDs, the SCI and Planning Briefs

The SCI, SPDs (Supplementary Planning Documents) & Planning Briefs

The 301, 37D3 (Supplementary Flamming Documents) & Flamming Briefs			
Stage	What we will do	Additional options (see paragraph 2.37 above)	
Preparation	No specific requirements.	Informal engagement with relevant stakeholders to agree the level of detail and identify key issues.	
Consideration	 Consult for a minimum of 4 weeks; Notify Ward Members we consider will be affected by it; Notify registered contacts (Appendix A) we consider will be affected by it; Make consultation documents available from our principal office²²; Make consultation documents available in alternative formats on request; Make consultation documents available on our website. 	 Longer consultation period; Issue a press release; Publicise the consultation on our website; Publicise and make consultation material available from other locations across the city e.g. First Point centres and libraries; Try to arrange special features in local newspapers and local radio; Notify neighbourhood publications; Publicise using posters or newsletters; Publicise as a news item on our website or via other electronic or social media methods e.g. Twitter; Public exhibitions, public meetings, drop-in sessions aimed primarily at residents; Meetings or workshops with representatives of businesses and other organisations; Questionnaires; City conference; 	



Statement of Community Involvement Consultations on Planning Policy Documents

Stage	What we will do	Additional options (see paragraph 2.37 above)
		 Provide an online consultation tool for consultees and agents to make comments online; Provide an interactive online map.
Adoption/ approval	 Consider the representations received through the consultation and make amendments necessary before adopting, or in the case of Planning Briefs, approving; Once adopted/approved we will make it available on our website, and from our principal office²³; Notify any person or body that made a representation or who has asked to be notified of the adoption; 	 Issue a press release; Publicise as a news item on our website or via other electronic or social media methods e.g. Twitter.

Giving Feedback to Consultees

- 2.42 After each stage of consultation, a report summarising the consultations undertaken, the comments received from consultees, and the Council's response to them will be published and those who commented will be notified.
- 2.43 Consultees will be informed about our responses to their comments in consultation reports when the document is next published.





3. Consultations on Planning Applications

Background to Current Practice

- 3.1 We are proud of our commitment to effectively engage the community in the planning application process. We have a long-established 'Chance to Speak at Planning Committee' procedures; are mindful that not every household has internet access; and have developed excellent services on our website, making public engagement easier and more efficient.
- 3.2 Our vastly improved website service provides real time updates on planning application submissions and decisions. The supporting document 'Code of Practice on Publicity and Consultation on Planning Applications', provides detailed practical advice for officers, with illustrated examples of notification requirements. It is published alongside the SCI in the interest of transparency and can be accessed via our 'How the Council consults on planning applications & policies' web page.
- 3.3 In order to minimise disruptions to Planning Committee proceedings, any representations submitted to us in relation to an item to be presented at Planning Committee, must be submitted by 24 hours before the meeting commences; after that deadline, any representations received will not be presented to the Planning Committee.
- 3.4 As explained in paragraphs 1.7 to 1.10 above, in the case of a local, national or international emergency such as the pandemic caused by the Corona virus in February 2020; it may not be possible to undertake the comprehensive set of consultation measures or processes set out in this Chapter.
- 3.5 In those circumstances, it may be necessary for us to temporarily consider reductions in services, imposition of service restrictions, or temporarily cancelling planning committee meetings in the light of Sheffield City Council or Government advice during such emergencies. To minimise delays in those exceptional circumstances, we will endeavour to notify customers significantly affected by any changes to our services. We will also publish any significant service changes on our website as soon as possible.

Site Notices and Notification by Letter

- 3.6 Legally, any owner or occupier of land adjoining the land to which an application relates will be notified²⁴. We do this either:
 - a) by site display (Statutory Site Notice) on or near the application site for at least 21 days; or,
 - b) by serving notice on them (letter or e-mail).
- 3.7 In Sheffield, wherever possible, all neighbours adjoining a proposal are notified by letter, unless an e-mail address has been provided. Letters are considered beneficial for more hard-to-reach communities and residents without access to the internet.
- 3.8 In most cases, we will not know who owns or lives in properties adjacent to a proposal and so a letter to the owner/occupier is necessary. **The period for responding is 21 days**. Any late representations received before a decision is made will still be considered.

Town and Country Planning (Development Management Procedure) (England) Order 2015.

- 3.9 Where a planning application may affect neighbours beyond those adjoining the site, such as from odours or visual impact, wider notification is undertaken. We will always limit notification to those adjoining the proposal, to those required by this SCI and to those required by the associated Code of Practice.
- 3.10 Our Code of Practice explains (with examples): where wider neighbour notification applies; the development types to which it applies; how it will be delivered; and how many adjacent properties will be sent notification letters.
- 3.11 Due to resource limitations and the availability of information on our website, we now alert the wider community to these applications by displaying site notices. These are displayed on the application site or the nearest suitable piece of street furniture.
- 3.12 We will alert any local community groups with a known interest by e-mail.
- 3.13 Neighbours are not re consulted for minor amendments or where amendments clearly address planning concerns. A significant need to re-notify neighbours will outweigh any other considerations, but a second notification period will be shorter than the initial 21 days.
- 3.14 Shorter consultation periods can be reasonable for further rounds of neighbour notification. Especially where neighbours can quickly assess possible changes via our web services. However, additional consultation periods will not be less than 10 working days from the date letters are sent or notices posted. If individuals have provided an e-mail address, all further communication will be by e-mail, rather than post.

Other Statutory Requirements

- 3.15 The principal other statutory requirements include:
 - A public register of all applications is published on our <u>website</u>. For those
 without internet access, internet access and assistance can also be found at
 First Point in Howden House, Union Street and in local libraries.
 - A statutory site notice and advertisement in the legal notices section of the Sheffield Telegraph for:
 - applications affecting Listed Buildings, Conservation Areas or an Ancient Monument; or
 - applications that depart from the local plan and include an Environmental Assessment (under the relevant regulations) or affect a right of way.
 - Parish and Town Councils are classed as statutory consultees. In Sheffield this includes Bradfield and Ecclesfield Parish Councils and Stocksbridge Town Council.
 - Applicants inform application site owners and agricultural tenants by notice, if different from the applicant.
 - Representations on planning grounds are material considerations that
 must be considered in the application decision-making process. Our Planning
 Committee or delegated decision application reports include an assessment of
 the material considerations and a summary of all representations on planning
 grounds received.



• All those making written representations on an application are informed of any appeal against the eventual application decision.

Chance to Speak at Planning Committee

3.16 We offer the public and applicants a chance to speak at the Planning Committee, which should not be used as an alternative to providing comments in writing during the officer assessment of the application. The chance to speak is at the Chair's discretion and it may not be possible for everyone who wants to speak to do so. We provide guidance on our website explaining the process.

Recording of Meetings

3.17 Recording of Planning Committee meetings is allowed under the direction of the Planning Committee Chair, except in circumstances where the public has been excluded as permitted by law. The rights of members of the public who do not wish to be recorded will always be protected during our meetings. We provide a link to guidance on these procedures contained in our protocol on audio / visual recording and photography on our website.

Decisions on Planning Applications

3.18 It is not legally required, but we currently inform every individual or group representative who has made written representations of the application decision. In exceptional cases, where a decision receives much media coverage and hundreds of representations, this is deemed unnecessary. As familiarity with obtaining this information on our website grows and/or resource constraints make it difficult to justify writing letters when e-mail addresses have not been provided, we may stop sending these letters.

Enforcement

3.19 Enforcing planning conditions, approved plans and unauthorised developments, is prominent in Sheffield. We periodically give full enforcement reports to Planning Committee of progress made on enforcement action authorised by the Planning Committee. You can now report a planning issue online. Future investment in enforcement software may open opportunities to improve online access to statutory enforcement action.

Substantial Additional Consultation on Development Proposals

3.20 We strongly encourage pre-application consultations by applicants, especially on larger schemes. We apply an 'Added Value Test' to determine when substantial additional publicity and consultation measures should be taken at pre application stage and/or after submission of a major application. When applying the test, we ask the following questions.

Will substantial additional publicity and consultation measures:

- A. Help the community shape a major regeneration scheme or a scheme with a wide community impact? Or
- B. Overcome barriers to service and assist hard-to-reach groups such as some Black, Asian Minority Ethnic and Refugee (BAMER) communities? Or
- C. Generate informed debate on complex planning issues of wide significance?
- 3.21 The objective of substantial additional consultation is to engage in useful dialogue, not to provide extra opportunities for lobbying by objectors.

Methods of Consultation and on Substantial Planning Applications

- 3.22 Where a proposed scheme meets one or more of the Added Value Test criteria (see paragraph 3.20 above), it is the applicant's responsibility to undertake consultation on substantial planning applications. Applicants are welcome to use whatever techniques and approaches they think are appropriate. However, the Council will continue to encourage the applicant's use of the following proven consultation methods:
 - Media coverage, by briefings, press releases and the Council's website.
 - Meetings in the Planning office between planning officers and small groups of people and their elected representatives, where detailed dialogue might be useful.
 - Exhibitions of proposals with the opportunity to make comments. Other techniques such as 3D models can be used at exhibitions.
 - **Public meetings**, to ensure wide community involvement and with neutral chairing.
- 3.23 In all cases, every effort must be made to organise events in a way that promotes dialogue and understanding, and tries to avoid confrontation. Public meetings organised by particular interest groups to push the objectors' point of view are considered 'campaign meetings' and will not usually justify officer attendance.

Validity of Pre-Application Consultations

- 3.24 Pre-application consultation needs to be meaningful and not seen as a public relations exercise to win support for a pre-determined proposal. Therefore, we will encourage developers to agree their approach to consultation with us in advance. We will apply criteria to test the validity of pre-application consultation and determine whether the responses can be given weight by the Council when deciding an eventual application.
- 3.25 We will ask:
 - Was the process of consultation transparent and inclusive?
 - Have objections based on sound planning reasons been addressed?
 - Is a consultation supporting statement submitted with the application, enabling the process and outcomes to be validated?
- 3.26 The applicant is responsible for pre-application consultation and the costs of implementation. Where undertaken, an applicant should submit a supporting consultation statement with the eventual planning application, summarising the methods used, representations received, and changes made to the proposals.
- 3.27 To assist applicants and promote best practice, we will offer advice and support to applicants. In addition to publishing guidance on our <u>website</u>, we will respond to requests for advice on the applicant's proposed method of pre-application consultation and on the proposed content of consultation material. Our service target is to respond within 15 working days of receipt of any such request for assistance.
- 3.28 Pre-application consultation will not remove the need for us to publicise an application in accordance with statutory requirements and in accordance with this Statement of Community Involvement.

Accessibility of Planning Services

- 3.29 It is essential that special measures be taken to ensure that those finding it difficult to see plans and obtain advice and assistance from us in the city centre, have adequate alternative means to get information. Alternative means include free access to the internet and information leaflets at local First Points and libraries, and a good telephone service.
- 3.30 You can use any of the following alternative means:
 - Visit First Point at Howden House to view plans online and see planning officers.
 - Attend Planning Committees at the Town Hall, which are fully accessible for disabled people.
 - Obtain large print, audio tape or Braille versions and translations into other languages for all planning documents.
 - **Meet with officers** who will provide extra explanation to individuals who need extra help to read or understand drawings.
 - Arrange interpretation support through First Point.
 - Google Translate is available on all web pages and provides basic translations in to several languages.
 - All web pages are written to cater for screen readers.
- 3.31 For individuals and groups with limited financial resources, who wish to make a planning application or put forward representations on an application, <u>Planning Aid</u> England can provide a free advice service.
- 3.32 Our website provides good access to the planning application process, including the following key features:
 - View all application drawings, amended drawings, additional drawings and associated documents online. Providing online access to all drawings makes it easier to meet government targets for determining applications without constraining your ability to make representations.
 - Track applications of interest and receive automatic e-mail alerts when any new documents are added to an application file.
 - Make comments online while viewing application details.
 - All public contributions (written representations) are published online, providing confirmation of receipt.
 - Comprehensive access to decision information, including planning conditions, section 106 agreements, reports explaining how the decision was made, agendas, committee dates, member information and minutes/decisions.
 - Access to a live database that is continuously updated as new information is inputted into the Council's planning application system.
 - Access to a 'weekly list' search option used to making weekly checks on applications of interest for the convenience of customers.
 - New search options include a spatial element, e.g., enabling a resident to identify applications near their house, at distances they can specify.
 - Register an interest in applications for a geographical area and be automatically alerted to any applications submitted of possible interest.





Appendix 1: Types of Consultation and Costs

We will always try to achieve the maximum possible participation from the community, but we also have to consider our resource constraints and manage them effectively. The table below shows the broad resources required for the different types of consultation we propose.

Planning Applications

Type of consultation	Material Cost	Staff time
A public register of all applications (para. 3.15)	Low	Moderate
Statutory site notices for application types listed in (para.3.15)	Moderate	Moderate
Guidance on the application process is on our website (para.3.32)	Low	Low
A weekly list of all applications submitted is published on our website (para.3.32)	Low	Moderate
Local media are provided with information on significant applications (para.3.22)	Low	Moderate
Consulting on telecom prior approval applications that are near schools (para.3.15)	Low	Low
Where considered appropriate, public meeting or exhibition (para.3.22)	High	High





Appendix 2: Duty to Co-Operate and General Consultation Bodies

We will notify specific bodies (listed below) about consultation on the Sheffield Local Plan and Supplementary Planning Documents (SPDs), if we consider they may have an interest in the subject of the proposed document: ²⁵

- The Coal Authority
- The Environment Agency
- The Historic Buildings and Monuments Commission for England (Known as English Heritage)
- The Marine Management Organisation
- Natural England
- Network Rail Infrastructure Limited
- The Highways Agency
- A relevant authority in or adjoining Sheffield City Council:
 - o Rotherham Metropolitan Borough Council
 - Barnsley Metropolitan Borough Council
 - Doncaster Metropolitan Borough Council
 - Derbyshire County Council
 - NE Derbyshire District Council
 - Peak Park Planning Board
 - Bradfield Parish Council
 - Ecclesfield Parish Council
 - Stocksbridge Town Council
- Parish Councils adjoining the Sheffield local planning authority area:
- Brinsworth, Catcliffe, Orgreave, Aston cum Aughton, Wales, Wentworth, Tankersley, Hunshelf, Langsett, Wortley, Dronfield, Eckington, Holmesfield and Killamarsh
- Local Enterprise Partnership
- Mobile Operators Association (representing the four UK mobile operators)
- Sheffield Clinical Commissioning Group, Public Health in Sheffield, and NHS England South Yorkshire
- Northern Powergrid
- National Grid
- Yorkshire Water
- Homes and Communities Agency
- Sheffield City Region Local Enterprise Partnership
- South Yorkshire Passenger Transport Executive
- Civil Aviation Authority
- Office of Rail Regulation
- Neighbourhood Forums ²⁶

General consultation bodies include voluntary groups and those representing the interests of different: racial, ethnic or national groups; disabled persons; religious groups; and persons carrying on business in the Sheffield area.



Paragraph 18 of The Town and Country Planning (Local Planning) (England) Regulations 2012
 legislation.gov.uk - The Neighbourhood Planning (General) and Development Management
 Procedure (Amendment) Regulations 2016, Regulation 3



Appendix 3: National Planning Policy & Acts of Parliament

Statutes and Policies

The preparation of an SCI is a requirement of **Section 18 of the Planning and Compulsory Purchase Act 2004**. Its purpose is to set how the Council will consult and involve the public in planning matters. The Council is legally obliged to comply with its SCI.

The **National Planning Policy Framework (NPPF)** Paragraph 16, Sub-paragraph c states that plans should: "be shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees …"

The **Localism Act 2011** places strong emphasis on the importance of community involvement within the planning system. Together with the National Planning Policy Framework (NPPF), the Act introduced Neighbourhood Planning and the Duty to Co-operate.

Plan-making

Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) and Planning and Compulsory Purchase Act 2004. This Act sets out which documents must be developed with community input, who should be consulted and which documents must then be examined by an independent Inspector.

Planning applications

The Town and Country Planning (Development Management Procedure Order 2015 (or any subsequent amendment).

Equality

The **Equality Act 2010** places a **Public Sector Equality Duty** (PSED) on us. A public authority or those who exercise public functions (e.g., our contracted partners who deliver our services) must, in the exercise of its functions, have due regard for the requirement to:

- Eliminate discrimination, harassment, victimisation;
- Advance equality of opportunity; and
- Foster good relations





Appendix 4: Glossary

Access Liaison Group: the Council's primary means of consultation with disabled people about access and an inclusive built environment, at policy level and in terms of practical requirements. The Group is supported by the Council's Access Officers and chaired by a disabled member.

Area Action Plan: a document providing a planning framework for an area where significant change or conservation is needed. Area Action Plans will have the status of Development Plan Documents.

Black, Asian, Minority Ethnic and Refugee (BAMER) communities: Black, Asian, Minority Ethnic and/or Refugee communities in the UK. This includes anyone who is non-white British.

Carer: a person who provides unpaid care for a disabled relative, child, friend or other person

Development Plan Document (DPD): planning documents that are subject to independent examination and form part of the statutory development plan for the area, e.g., the Local Plan and Area Action Plans.

Disability Sheffield: is a lottery funded, membership and user led charitable organisation, run and controlled by disabled people. They are an Equality hub sponsor. Disability Sheffield promotes independent living for disabled people in Sheffield. By independent living they mean that disabled people should have the same freedom and rights to exercise choice and control over their own lives as any other person.

Disabled person: - Someone who has a physical or mental impairment that has a substantial (more than minor) and long-term (usually over 1 year) adverse effect on his or her ability to carry out normal day-to-day activities.

Social Model of disability: A disabled person is an individual who has an impairment and whose experiences are continually affected by contemporary social, educational, environmental or economic trends. These trends take little or no account of her/his 'rights' as a person to reach her/his maximum potential. Consequently, the individual is unable to participate fully in society. This view of disabled people is known as the Social Model of Disability. In other words, society and the built environment disable those people with impairment, not the condition.

Early Involvement: Involving the community at an early stage in the preparation of local development documents or major development proposals. Sometimes referred to as 'front loading'

Examination: the independent examination conducted by a planning inspector to test the soundness of a Development Plan Document or Statement of Community Involvement.

Equality Hub Network: A City Wide network of individuals and groups, based around people who share protected characteristics in the Equality Act 2010. There are hub networks for BME, disabled, women, age (young and older), religion/ belief, LGBT (lesbian, gay, bisexual and trans people) and carers and a Board and joint events which bring all hubs together. The Network helps ensure the Council is engaging with and involving the full range of citizens that live and work in the city.

FaithStar Foundation: Is a Sheffield based charity that is an Equality Hub sponsor. They lead the way in faith-based and financial management, to enable places of worship,

faith charities and organisations in meeting regulatory requirements of the civic, financial, ecclesiastical and religious laws that they are governed by.

Front loading: Involving the community at an early stage in the preparation of local development documents and major development proposals. Sometimes referred to as 'early involvement'

First Point and Local First Points: public reception centres where people can find out about Council services. First Point in Howden House, Union Street, S1 2SH, is in the city centre and is where planning applications and other records can be inspected. Local First Points have been established in Hillsborough, Burngreave, Darnall, Manor, Lowedges and Chapeltown.

Hard-to-reach: groups of people who do not normally take much part in the planning process.

LGBT Sheffield: Umbrella organisation bringing together organisations, groups and individuals representing <u>#LGBT</u>+ people in <u>#Sheffield</u>. LGBT Sheffield is an Equality Hub sponsor.

Local community forums: community-based organisations that link together local groups, and run or initiate projects and services to improve the quality of life of residents.

Local regeneration partnerships: community-based organisations similar to local community forums but focused especially on regeneration.

Local Development Scheme (LDS): sets out the 3-year programme for preparing Local Development Documents.

Planning Aid: provides a free, independent and professional planning advice service to individuals and groups who cannot afford professional fees.

Planning Committee: a committee (full title 'Planning and Highways Committee') composed of city councillors. It is responsible for planning applications, Tree Preservation Orders, enforcement action and some highway, footpath, road safety and traffic management issues for the whole City. It is also responsible for determination of City Centre planning, development of transport matters and strategic development projects.

Planning Inspectorate: the body which provides an Inspector (appointed by the Secretary of State) to carry out an independent assessment of the soundness of a Development Plan Document or Statement of Community Involvement. The Inspectorate also processes planning, listed building consent, advertisement and enforcement appeals.

Prior approval application: an application notifying the Council that an applicant intends to carry out development that does not require planning permission.

Proposals Map: a map of the city (on a registered scale) illustrating the policies and proposals in Development Plan Documents. The adopted Proposals Map must be revised as each new DPD is adopted.

Qualifying Neighbourhood Planning Body (QNPB): Only qualified bodies can prepare a neighbourhood plan for their area. There are two types of qualifying bodies: Parish or Town Councils; or areas outside of a parish, designated as neighbourhood forums.

New Media: refers to on-demand access to content at anytime, anywhere, on any digital device, as well as interactive user feedback, and creative participation.

Race: refers to ethnicity, colour and nationality of a person.

Religion or Belief: this refers to religious belief or the lack of it (which is a belief). Religious belief means the belief in a religion's central articles of faith, for example, within Christianity that Jesus is the Son of God. It also means beliefs which exist within a religion, but that are not shared by everybody within that religion. Religion or belief discrimination is when you are treated differently because of your religion or belief, or lack of religion or belief, in one of several situations covered by the Equality Act. The treatment could be a one-off action or because of a rule or policy. It does not have to be intentional to be unlawful. There are some circumstances when being treated differently due to religion or belief is lawful.

Soundness: a Development Plan Document will be sound if it meets certain tests at the Examination stage. These tests require that a document is prepared according to the correct procedures, that it conforms to other policies, and that its proposals are coherent, consistent and effective.

Staff Equality and Inclusion Networks: These Networks are open to all staff within Sheffield City Council who are interested in equality, diversity and inclusion. These networks have replaced former staff equality forums based on staff with a single protected characteristic.

Stakeholders: individuals or organisations who stand to gain or lose from the impact of a planning policy, proposal or decision. The term is used mostly to refer to bodies or individuals that will affect the delivery of a planning document's policies and proposals.

Statutory Site Notice: a notice or poster that the Council posts on site to further publicise a planning application, in accordance with legal requirements.

Strategic Options: ideas, possibilities and alternative proposals produced at an early stage in the production of the Local Plan and issued for public consultation and have not been endorsed by the Council.

Submission: the stage in producing a Development Plan Document when it is given to the Secretary of State for independent examination.

Supplementary planning document (SPD): a Local Development Document which provides supplementary information on the policies in Development Plan Documents. SPDs are not subject to independent examination. An SPD may be related to a topic or to a specific area.

Sustainability appraisal: a tool for appraising policies to ensure they reflect sustainable development objectives (that is social, environmental and economic factors) and required in the Act to be undertaken for all Development Plan Documents.

Together Women's Project: A charitable Equality Hub sponsor organisation, working to support women and girls with multiple and complex needs across the North of England. The Together Women Project has a Sheffield based centre and aims to move women out of crime and into positive futures, working with them in safe, women-only spaces, building resilience and developing strengths that enable them to move away from damaging lifestyles.