Dear Inspector

East Suffolk Council - Suffolk Coastal Local Plan
Main Modifications Consultations

The Council would like to thank the Inspector for his note dated 29th April 2020.

Following the hearings which took place in August and September 2019, the Council has been committed to progressing towards a consultation on Main Modifications and to subsequently being in a position of being able to adopt the Local Plan.

Recent events surrounding Covid-19 have of course changed the way in which some consultation practises can be carried out in a way which enables safe participation. In advancing to the consultation on the Main Modifications, the Council has therefore given careful consideration to the implications arising from the present social distancing measures, considering those who may be affected and how the Council can ensure such groups are not disadvantaged.

Whilst there are no directly relevant Regulations or measures outlined in the Statement of Community Involvement covering the Main Modifications consultation, the Council would normally follow the ‘scope and duration of the consultation’ undertaken for the consultation on the Final Draft Local Plan under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended), as advised in the PINS Procedure Guidance for Local Plan Examination (June 2019) (paragraph 6.8). Page 12 of the Statement of Community Involvement sets out the measures that the Council would take at Regulation 19 (Publication of the Local Plan) and which it would also usually therefore take at the Main Modifications consultation stage.

Most of these measures can continue under the current circumstances. The Council, for all of its planning policy consultations, encourages as a preference people to get involved via the website and the online consultation system, however recognises that for some consultees documents can only reasonably be accessed in hard copy. Making documents available to view in libraries and in...
Council offices is however not presently possible. The Council is also mindful that consultees may need more time to consider the consultation documents and to respond than might normally be the case.

The Council has given particular consideration to any groups which may be affected as set out in the Equality Impact Assessment attached to this letter, paying attention to the Equality Act 2010.

Following careful consideration, the Council has therefore put in place the measures set out below. Where these relate to measures set out in the Statement of Community Involvement, these are consistent with the Council’s note ‘Temporary Suspension of Statement of Community Involvement for Planning Policy Purposes’ (May 2020).

The alternative measures, or adjustments, put in place for the consultation on the Suffolk Coastal Local Plan Main Modifications are:

- The consultation is being held for an extended period of ten weeks. This is a considerable extension to the usual six weeks (and to the usual extended period of eight weeks);

- The Council will where possible provide hard copies of consultation documents, and comments forms, in the post free of charge to anyone who is unable to access the documents online. It should be noted that the Council does not usually make hard copies of all evidence documents available in the Council’s offices and in libraries but in view of internet access being available in libraries will provide these by post where possible and where needed for those unable to access the Internet. This will enable those who do not have Internet access to view the documents;

- The Council will issue a press release at the start of the consultation. In addition, and going beyond usual practice, the Council will issue a further press release during the consultation. In addition to the press releases, the Council will also place adverts in local newspapers to ensure coverage.

- The Council will be clear in its correspondence as to how officers can be contacted via phone when not in the office. The team are currently operating under a voicemail service. Consultation material (including letters and emails to consultees) sets out that should anyone wish to contact the team they may leave a message including contact details and that their call will be returned as soon as possible.

- The arrangements will be kept under review throughout the consultation in view of any changing external circumstances. Any changes to arrangements will be communicated to all who have been directly contacted and via the website, press release and social media.

The Council will directly contact all of those whose details are held on the planning policy consultation database. This includes many who have not been previously engaged in the preparation of the Suffolk Coastal Local Plan. The Council has given consideration to how groups
such as Town and Parish Councils, or other organisations, would be able to respond. It is recognised that such organisations will not be able to meet in person at present and may therefore need to use any alternative methods that they have in place. Extending the consultation period to ten weeks will assist with timing issues arising from this.

For those who do not have access to the Internet, and who are not on the Council’s planning policy consultation database, the press release would be used to raise awareness at this stage. As the Council is still able to issue a press release, and is going further by placing press adverts, it is considered that those without internet access are unlikely to be prejudiced by the alternative arrangements.

The Council has also been mindful, in considering the consultation, of the need to ensure that progress on the Local Plan continues in order to support the economy and communities of East Suffolk going forward. By putting in place the measures outlined above which enable all those with an interest in the Suffolk Coastal Local Plan to participate in the Main Modifications consultation in a fair and equal way it is considered appropriate that progress with the Suffolk Coastal Local Plan continues.

Yours sincerely,

Desi Reed | Planning Policy and Delivery Manager
East Suffolk Council