

WELSH GOVERNMENT INTEGRATED IMPACT ASSESSMENT

Title of proposal:	The Planning Applications (Temporary Modifications and Disapplication) (Wales) (Coronavirus) Order 2020
Official(s) completing the Integrated Impact Assessment (name(s) and name of team):	Planning Directorate
Department:	ESNR
Head of Division/SRO (name):	Neil Hemington
Cabinet Secretary/Minister responsible:	Julie James MS, Minister for Housing and Local Government
Start Date:	April 2020

SECTION 1. WHAT ACTION IS THE WELSH GOVERNMENT CONSIDERING AND WHY?

Amendments to the Town and Country Planning (Development Management Procedure) (Wales) Order 2012 (“the DMP(W)O”)

Background

Section 17 of the Planning (Wales) Act 2015 inserts Section 61Z into the Town and Country Planning Act 1990 (“TCPA 1990”). Section 61Z introduces a requirement to carry out pre-application consultation where the proposed development is of a description specified in a development order. For this purpose, the procedure is specified in Part 1A of the DMP(W)O. The requirement to carry out pre-application consultation is limited to development falling within the definition of major development, as prescribed in article 2 of the DMP(W)O, and involves any one or more of the following:

- a) the winning and working of minerals or the use of land for mineral-working deposits;
- b) waste development;
- c) the provision of dwellinghouses where—
 - i. the number of dwellinghouses to be provided is 10 or more; or
 - ii. the development is to be carried out on a site having an area of 0.5 hectares or more and it is not known whether the development falls within sub-paragraph (c)(i);
- d) the provision of a building or buildings where the floor space to be created by the development is 1,000 square metres or more; or
- e) development carried out on a site having an area of 1 hectare or more;

Provision contained in Part 1A of the DMP(W)O, section 2C(1)(b), requires developers to publicise the proposed application by making prescribed information available for inspection at a location in the vicinity of the proposed development for not less than 28 days. Welsh Government Guidance suggests that where the developer has made the application information available on a website, details of the location for public viewing can be a library or other public building where computer facilities are made available to the general public. Alternatively, the developer may provide a hard copy in public buildings. A privately owned building may also be used, however it must be accessible by the public.

As part of the measures introduced as part of the ongoing response to COVID-19, all non-essential public buildings have been closed, there are restrictions on non-essential travel and certain groups are advised not to leave their homes. As a consequence, developers are unable to comply with all of the requirements of Part 1A. Applications for major development that have not completed pre-application consultation in accordance with the provisions prescribed in Part 1A of the DMP(W)O should not be submitted to local planning authorities.

Proposal

The Welsh Government propose to amend Part 1A of the DMP(W)O to remove the requirement for information to be made available in a local place. All information must instead be hosted online. Developers will also be required to provide a contact telephone number on their requisite notice (i.e. site notice and direct notification letters) for those without internet access to discuss the proposed development and, where necessary, request hard copies of the information. This is explored further in the equality impact assessment.

The aim of the proposals is to restart the pre-application consultation process to enable the submission of applications for major development, which has not been possible since COVID-19 lockdown measures were introduced (if the pre-application consultation process was not complete prior to public buildings closing and the other restrictions brought in).

In addition, it is also proposed to amend Article 16 of the DMP(W)O. Article 16 prescribes a community council must notify the local planning authority who are determining a planning application as soon as possible whether they propose to make any representations about the manner in which the application should be determined, and must make any representations to that authority within 14 days (or 30 days in the case of an EIA application), of the notification to them of the application. The Local Planning Authority must not determine the application within this period unless they have received representations or been notified that they do not propose to make any representations, whichever comes first. The Local Planning Authority must take into account any representations received and notify the community council of the decision.

It is proposed to amend Article 16(1) of the DMP(W)O to extend the period during which Community and Town Councils must make representations from 14 days to 21 days to account for difficulties in scheduling and undertaking regular meetings due to COVID-19 restrictions.

Amendments to the Developments of National Significance (Procedure) (Wales) Order 2016 (“the DNSP(W)O”).

Background

Article 12 of the DNSP(W)O sets out the general requirements which are applicable to the making of a planning application for a Development of National Significance (“DNS”). Article 3 of the DNSP(W)O enables electronic communication to be used by a person for the purpose of fulfilling any requirements of the DNSP(W)O, notably the giving or sending of any statement, notice or other document to any other person. Relying on Article 3, applications for DNS are typically submitted electronically, however, there is special provision at Article 12(5) of the DNSP(W)O requiring a hard copy of the DNS planning application to be deposited the same day with the Welsh Ministers and the LPA, where an application is submitted electronically.

Practical issues have now arisen whereby applicants may attempt to submit an application, however, they may not be able to comply with the requirement at Article 12(5) of the DNSP(W)O due to the ongoing restrictions in response to COVID-19, and the closure of non-essential public buildings. As a consequence, compliance with Article 12(5) cannot always be verified.

Proposal

The Welsh Government propose to omit Article 12(5), as well as making associated consequential amendments, to ensure that the submission requirements at Article 12 of the DNSP(W)O can be fully complied with.

The proposed legislative amendments would apply in relation to a temporary 4 months period in response to the impacts of COVID-19.

Collaboration & Involvement

Due to the urgent need to make the legislative changes to respond to the COVID-19 emergency and maintain a functioning planning service, public consultation on the proposals has not been possible. However, the Welsh Government made stakeholders aware of the potential changes through a letter, published on the Welsh Government website, providing guidance on the operation of planning services.

Several planning consultancies and developers have also contacted the Welsh Government directly with their concerns regarding compliance with pre-application consultation legislation under the current circumstances. The proposed legislative changes will address the concerns raised.

Impact

A regulatory impact assessment has been prepared as to the likely costs and benefits of complying with the proposed legislative amendments. This will be published with the final statutory instrument.

Prosperity for All

Prosperity for All acknowledges planning decisions affect every area of a person's life and sends a message of working differently. The strategy states the right planning system is critical to delivering the Welsh Government's objectives.

The proposed changes to procedures are in response to the direct and indirect impacts of COVID-19. The Welsh Government are responding to the challenges by temporarily amending procedures to ensure the smooth functioning of the planning application system, supporting Local Authorities to deliver sustainable development, and supporting businesses by maintaining an effective planning system which provides the means for creating economic growth.

The Well-being of Future Generations (Wales) Act

Section 3 of the Well-being of Future Generations (Wales) Act 2015 ("the WFG Act") places a duty on the Welsh Ministers, as a public body, to work to improve the social, economic and environmental and cultural well-being of Wales, by taking action in accordance with the sustainable development principle, aimed at achieving the well-being goals as set out in section 4 of the WFG Act). The action the Welsh Ministers take must include setting and publishing of well-

being objectives. The ways of working (set out in section 5 of the WFG Act) have been taken into account through the policy development of this legislation.

The temporary changes to planning procedures proposed through this legislative change as part of the Government's response to the COVID-19 emergency could make a contribution towards the goals 'a prosperous Wales' and 'a resilient Wales' by adapting current procedures to ensure the planning system can continue to function effectively and accordingly developers can maintain business continuity through the continued submission of planning applications. This will contribute towards ensuring people with roles linked to the planning system remain in employment during this national emergency, supporting wealth creation and a vibrant economy.

We have considered whether, having regard to the Welsh Minister's wellbeing duty, it would be reasonable to take a different decision. Not allowing this relaxation may delay the emergency response which would negatively impact on the well-being objectives overall. Consequently, officials consider that the recommendation is a reasonable step in meeting the Welsh Minister well-being objectives.

SECTION 2. WHAT WILL BE THE EFFECT ON SOCIAL WELL-BEING?

People and Communities

Amendments to the Town and Country Planning (Development Management Procedure) (Wales) Order 2012 (“the DMP(W)O”)

Pre-application consultation - the Local Community

Mitigation has been put in place to ensure those who do not have internet access can still access the relevant information. A telephone number will be provided on the site notice which those without internet access can contact to request a hard copy of the relevant information. They can also discuss the development with the developer/agent.

Developers will also be asked to use social media to advertise their consultations to ensure the widest possible reach.

This is only the pre-application stage of the application process. A full, statutory public consultation will also be undertaken by the Local Planning Authority once a planning application is submitted. This provides the local community with a second opportunity to comment on the application before it is determined.

The local community will benefit directly from the development industry being able to recommence major development – from large residential schemes providing housing in areas where there is a housing supply shortage to business building new premises which will create employment, both in the construction industry and to the end user of those facilities.

Planning applications – community councils

The proposals give community Councils an additional 7 days to provide their response to the Local Planning Authority. COVID-19 has impacted upon the ability of community councils to undertake their regular meetings due to meeting places being closed and members observing social distancing guidance. The additional time will provide community councils with breathing space to arrange remote meetings and provide timely responses to Local Planning Authorities.

Children’s Rights

There are no specific issues relating to United Nations Convention on the Rights of the Child (UNCRC).

Equality

An equality impact assessment has been completed (see annex)

Rural Proofing

Pre-application consultation is undertaken in the same manner in rural areas as it is in urban areas. However, it is acknowledged that there is an increased risk of homes having limited or not internet access in rural areas.

The proposed change will remove the need for developers to place information regarding development proposals in public locations or provide a public location where the information could be viewed online, such as a library.

All information will continue to be published on online. For those without internet access, they will be able to contact the developer by telephone to discuss the proposal directly and request hard copies of relevant information. This will be provided at the cost of the developer.

As this measure is temporary in response to COVID-19, and mitigation has been put in place, a full rural proofing impact assessment is not considered necessary.

Health

The proposed legislative changes will not impact upon health.

Privacy

The proposed legislative changes will not impact upon privacy.

SECTION 3. WHAT WILL BE THE EFFECT ON CULTURAL WELL-BEING AND THE WELSH LANGUAGE?

Cultural Well-being

How can the proposal actively contribute to the goal to promote and protect culture and heritage and encourage people to participate in the arts sports and recreation? (for Welsh Language see section 3.2)

The proposals have no impact, neither directly or indirectly, on the goal to promote and protect culture and heritage.

The proposals seek to re-start the pre-application consultation process and the subsequent submission of planning applications for major development. This could include schemes for arts, sports and recreation. The proposals will ensure such developments can pass through the planning system during the current COVID-19 pandemic, preventing delays to the construction of such facilities.

Is it possible that the proposal might have a negative effect on the promotion and protection of culture and heritage, or the ability of people to participate in arts, sport and recreation? If so, what action can you take to avoid or reduce that effect (for example by providing alternative opportunities)?

There are no negative impacts of the proposals in relation to these areas.

Welsh Language

Does the proposal demonstrate a clear link with the Welsh Government's strategy for the Welsh language? – *Cymraeg 2050 A million Welsh speakers* and the related Work Programme for 2017-2021?

No links.

Describe and explain the impact of the proposal on the Welsh language, and explain how you will address these impacts in order to improve outcomes for the Welsh language. How will the proposal affect Welsh speakers of all ages (both positive and/or adverse effects)? You should note your responses to the following in your answer to this question, along with any other relevant information:

The proposed legislative changes are not considered likely to have any impact, positive or adverse, on the Welsh language. This is a minor temporary amendment to an existing procedure as a result of COVID-19. All existing statutory requirements in respect of the Welsh language and the relevant provisions apply. In respect of pre-application consultation, developers are already advised to provide all information bilingually. The proposed amendments will not effect this.

It would be unreasonable to mandate changes in relation to the Welsh language as part of the proposed emergency legislation, particularly as it has not been subject to consultation.

SECTION 4. WHAT WILL BE THE EFFECT ON ECONOMIC WELL-BEING?

A regulatory impact assessment has been prepared as to the likely costs and benefits of complying with the proposed legislative amendments. This will be published with the final statutory instrument.

SECTION 5. WHAT WILL BE THE EFFECT ON ENVIRONMENTAL WELL-BEING?

<ul style="list-style-type: none"> Natural Resources Policy national priorities, challenges and opportunities 	<p>Not relevant. The proposed changes are temporary procedural amendments in response to COVID-19.</p>
<ul style="list-style-type: none"> Biodiversity 	<p>Not relevant. The proposed changes are temporary procedural amendments in response to COVID-19.</p>
<ul style="list-style-type: none"> Climate Change 	<p>Not relevant. The proposed changes are temporary procedural amendments in response to COVID-19.</p>
<ul style="list-style-type: none"> Strategic Environmental Assessment 	<p>Not relevant. The proposed changes are temporary procedural amendments in response to COVID-19.</p>
<ul style="list-style-type: none"> Habitats Regulations Assessment 	<p>Not relevant. The proposed changes are temporary procedural amendments in response to COVID-19.</p>
<ul style="list-style-type: none"> Environmental Impact Assessment 	<p>The procedural amendments relate to all development, included that which requires an Environmental Statement. This information will be published online by the developer with hard copies made available (upon request) to those who do not have internet access.</p>

SECTION 6. RECORD OF FULL IMPACT ASSESSMENTS REQUIRED

You have now decided which areas need a more detailed impact assessment. Please list them below.

Impact Assessment	Yes/No
Children's rights	No
Equality	Yes
Rural Proofing	No
Health	No
Privacy	No
Welsh Language	No
Economic / RIA	Yes
Justice	No
Biodiversity	No
Climate Change	No
Strategic Environmental Assessment	No
Habitat Regulations Assessment	No
Environmental Impact Assessment	No

SECTION 7. CONCLUSION

How have people most likely to be affected by the proposal been involved in developing it?

Due to the urgent need to make the legislative changes to respond to the COVID-19 emergency and maintain a functioning pre-application consultation procedure, public consultation on the proposals has not been possible. However, the Welsh Government made stakeholders aware of the potential changes through a letter, published on the Welsh Government website, providing guidance on the operation of planning services. Feedback received has indicated that the proposed changes are necessary.

Several planning consultancies and developers have also contacted the Welsh Government directly with their concerns regarding compliance with pre-application consultation legislation under the current circumstances. The proposed legislative changes will address the concerns raised.

The legislative changes are required to come into force as soon as possible, so adjustments to planning procedures can mitigate the effects of COVID-19 restrictions on travel and the opening of premises, enabling a functioning planning system. It will enable planning permissions to be in place for the construction sector to implement as soon as the restrictions are eased, thereby maximising recovery. If the changes are not taken forward, pre-application consultation cannot take place and subsequently the development industry will continue to be prevented from submitting planning applications for major development to local planning authorities. Furthermore, DNS planning applications would not be able to be validly submitted. This will cause an increasing backlog of planning applications waiting to be submitted, which would have consequential impacts for the construction sector, and economy, at a time when rapid reversal of financial losses is important to lessen the longer term economic and social damage being caused.

What are the most significant impacts, positive and negative?

Positive (pre-application consultation)

- Will enable the development industry to recommence the pre-application consultation process and the subsequent submission of applications for planning permission that leads to the construction of major development.
- Will ensure local planning authorities continue to receive income from the fees associated with applications for major development.
- Will ensure the smooth functioning of the planning application system, supporting Local Authorities to deliver sustainable development, and supporting businesses by maintaining an effective planning system which provides the means for creating economic growth.

Negative (pre-application consultation)

- The provision of all information online only may prevent those without internet access the ability to participate in the pre-application consultation process.

Positive (community councils)

- Community a councils will have additional time to arrange remote meetings and provide representations to local planning authorities on planning applications.

In light of the impacts identified, how will the proposal:

- **avoid, reduce or mitigate any negative impacts?**

In mitigation to the changes to pre-application consultation, developers are required to provide a contact telephone number on their requisite notice (i.e. site notice and direct notification letters) in order for those without internet access to discuss the proposed development directly and, where necessary, request hard copies of the information. This will ensure everyone has access to the information and is able to participate in the consultation process as per pre-COVID-19. Developers are also being advised to exploit the reach of social media and advertise their consultations on local community pages on Facebook, Twitter and other social media sites. In addition to general word of mouth, this should ensure consultations have as wide as reach as possible whilst movement restrictions are in place.

How will the impact of the proposal be monitored and evaluated as it progresses and when it concludes?

The Welsh Government will continue to monitor the impact of COVID-19 on the planning system. The legislative changes proposed are temporary and will be automatically revoked 4 months from the date the statutory instrument comes into force. However, should circumstances allow, legislation can be made to bring this period forward. If the impacts of COVID-19 extend beyond 4 months, legislation can also be made to extend this period.

SECTION 8. DECLARATION

Declaration

I am satisfied that the impact of the proposed action has been adequately assessed and recorded.

Name of Senior Responsible Officer / Deputy Director: Neil Hemington

Department: Planning Directorate

Date: April 2020

FULL IMPACT ASSESSMENTS

A. EQUALITY IMPACT ASSESSMENT

The proposed legislation amends three processes:

1. Community council consultation (planning applications)
2. Submission requirements for Development of National Significance
3. Pre-application consultation

Community Council consultation (planning applications)

Extending the period upon which Community councils can make representations to LPA on a planning application from 14 days to 21 days is not considered to impact negatively upon any protected characteristic or group.

Submission requirements for Development of National Significance (DNS)

Amending the depositing requirements for DNS applications is not considered to impact negatively upon any protected characteristic or group.

Pre-application consultation

Below is an assessment of the impacts of the proposed changes to the pre-application process.

Background

- i. Developers proposing to submit a planning application in respect of major development are required to undertake pre-application consultation. The Town and Country Planning (Development Management Procedure) (Wales) Order 2012 (as amended) prescribes information about the development to be made available for public inspection at a location in the vicinity of the proposed development for not less than 28 days.
- ii. The location in the vicinity of the proposed development can either host a hard copy of the information or consist of computer facilities which are available for public use. This ensures those without internet access at home/work have the ability to view the development proposal and engage in the consultation process.
- iii. The web address and physical location as to where the information can be accessed is published on a site notice situated outside the development site.

- iv. Due to COVID-19, public accessible buildings which have been used to host information, such as libraries, community centres and estate agencies are currently closed. The statutory requirement to invite people to a public accessible building, therefore cannot at present be met. As developers are unable to fully undertake pre-application consultation, they are unable to submit valid applications for planning permission for major development proposals.

Proposal

- v. To enable pre-application consultation to continue and the subsequent submission of planning applications for major development whilst public buildings remain closed, we are temporarily removing the requirement for a location in the vicinity of the proposed development to be used for public viewing of information about the development proposal. All information will instead be provided on a website, with hard copies (at the developers cost) available upon request.

Impact

- vi. Currently, the pre-application consultation process cannot be completed as the developers are unable to fully comply with the statutory requirements.
- vii. By amending legislation to enable pre-application consultation to continue without the requirement for local provision of hard copies of the consultation proposal, combined with public internet access locations being closed, may result in members of the following identified groups not being able to engage in the consultation process:
 1. The elderly – might not be digitally aware, or have access to a computer/internet capable device at home/work. Observing social distancing/self-isolation may also prevent neighbours/family from assisting. They may also not have the inclination to seek out such information online having traditionally always obtained information from local sources.
 2. Low income households - might not have access to a computer/internet capable device at home/work.
 3. Disabled – Persons with a physical impairment who may not be able to use a device capable of accessing the internet.

Mitigation

- viii. For those who are unable to access the information online, the site notice or direct letter will contain contact details so that the public are able to speak directly to the developer / project

team to ask questions, and request hard copies of the relevant documentation that they would like to view.

- ix. This is a temporary measure until such time public buildings are widely accessible to the public.
- x. Should the mitigation measures put in place fail to ensure everyone can participate in the consultation, there will be a second opportunity to engage in the planning process once the planning application is submitted. All planning applications are subject to a statutory publicity period undertaken by the local planning authority. At application stage, the public will also be able to make representations to their community council and/or local member in their role as local representative who in turn can relay their concern/support as part of their response to the application. Furthermore, if an application is to be determined by the planning committee, the public may request to address the committee directly to express their concern/support for the development.

Consultation

- xi. Due to the urgent nature of this amendment, the Welsh Government has not undertaken a consultation on these proposals. The proposed amendment is required to come into force as soon as possible, so adjustments to planning procedures can mitigate the effects of COVID-19 restrictions on travel and the opening of premises, enabling a functioning planning system. It will enable planning permissions to be in place for the construction sector to implement as soon as the restrictions are eased, thereby maximising recovery.
- xii. If these changes are not taken forward, pre-application consultation cannot be fully undertaken and subsequently the development industry will be prevented from submitting planning applications for major development to local planning authorities which have not been through pre-application consultation. Furthermore, DNS planning applications would not be able to be validly submitted. This will cause an increasing backlog of planning applications waiting to be submitted, which would have consequential impacts for the construction sector, and economy, at a time when rapid reversal of financial losses is important to lessen the longer term economic and social damage being caused.

Record of Impacts by protected characteristic:

Protected characteristic or group	What are the positive or negative impacts of the proposal?	Reasons for your decision (including evidence)	How will you mitigate Impacts?
Age	<p>Not all have access to, or the inclination to access, the internet, in particularly the elderly.</p> <p>The Office for National Statistics (ONS) collects and publishes data on internet use in the UK. In the absence of Wales centric statistics, we assume these UK-wide statistics translate to Wales.</p> <p>In 2019, 93% of the population had access to the internet. While almost all households had access to the internet, 7% did not. Most of these did not have access to the internet as they felt that they did not need it, with 61% reporting as such in 2019. Lack of skills and privacy or security concerns were also factors, at 34% and 33% respectively.</p> <p>Only 47% of adults aged 75 years and over are internet users. Of the 4 million adults who had never used the internet in 2019, more than half (2.5 million) were aged 75 years and over.</p> <p>https://www.ons.gov.uk/businessindustryandtrade/itandinternetindustry/bulletins/internetusers/2019</p>	<p>Whilst the number of elderly people accessing the internet is increasing, it is clear from the statistical evidence that adults aged 75 years and over have consistently been the lowest users of the internet.</p> <p>Moving all information online could therefore result in elderly members of the public not being able to access the necessary information. However, mitigation measures can be put in place to ensure all non-internet users can still access information and participate in the pre-application</p>	<p>If a person does not have access, or wish to access information online, they (or a person on their behalf) may contact the developer using the telephone number displayed on the site notice to request hard copies of the relevant documentation. This must be sent to those who request it at the developers cost.</p> <p>This will ensure everyone is able to access the information - either online or in hard copy - and can participate in the consultation process.</p>

	<p>https://www.ons.gov.uk/peoplepopulationandcommunity/householdcharacteristics/homeinternetandsocialmediausage/bulletins/internetaccesshouseholdsandindividuals/2019</p> <p>The removal of access to a hard copy in a public facility, or a public facility where the information can be viewed online, could therefore impact upon the ability of the elderly to engage in the consultation process.</p>	<p>consultation process.</p>	
<p>Disability</p>	<p>The Office for National Statistics (ONS) collects and publishes data on internet use in the UK. In the absence of Wales centric statistics, we assume these UK-wide statistics translate to Wales.</p> <p>In 2019, the proportion of recent internet users was lower for adults who were disabled (78%) compared with those who were not disabled (95%).</p> <p>https://www.ons.gov.uk/businessindustryandtrade/itandinternetindustry/bulletins/internetusers/2019</p>	<p>There are a significant proportion of disabled adults who have the capability to access the internet. Since 2014, the number of disabled adults who had recently used the internet increased by 13 percentage points to just over 10 million in 2019.</p> <p>The proposed mitigation measures will ensure those unable to access the internet are not excluded from participation in the</p>	<p>Should a disability prevent a person from accessing the information online, they (or a person on their behalf), can contact the developer on the telephone number that will be provided on the site notice (that is displayed outside the proposed development site) and request hard copies of all information hosted online. This will be posted at the developer's cost.</p> <p>This will ensure everyone is able to access the information - either online or in hard</p>

		consultation process.	copy - and can participate in the consultation process.
Gender Reassignment	No positive or negative impact	A person's gender would not hinder their access to online information.	None
Pregnancy and maternity	No positive or negative impact	Whether pregnant or on maternity, they would be able to access online information.	None
Race	No positive or negative impact	A person's race would not impact upon their access to online information.	None
Religion, belief and non-belief	No positive or negative impact	A person's religion would not impact upon their access to online information.	None
Sex / Gender	No positive or negative impact	A person's sex/gender would not impact upon their access to online information.	None
Sexual orientation	No positive or negative impact	A person's sexual orientation would not impact upon	None

		their access to online information.	
Marriage and civil partnership	No positive or negative impact	A person's marital situation would not impact upon their access to online information.	None
Children and young people up to the age of 18	No positive or negative impact	Children and young people would continue to access information online.	None
Low-income households	Whilst 90% of adults in Wales are internet users (https://www.ons.gov.uk/businessandtrade/itandinternetindustry/bulletins/internetusers/2019), there is a risk that there may be low-income households who may not have internet access at home or work.	The majority of adults in Wales have access to the internet and will be able to continue to participate in the pre-application process as they did pre-COVID-19. Mitigation measures have been put in place to ensure those who do not have internet access are not prevented from participating in the consultation process. This would include low-income households.	If low-income households do not have internet access, they may contact the developer on the telephone number that will be on the site notice (displayed outside the development site) and request hard copies of the information that is hosted online. This must be sent at the developers cost. This will ensure that low income householders are not prevented from participating in the pre-application process.