

EXETER GREEN PARTY
COMMENTS ON THE EXETER CITY COUNCIL DRAFT
STATEMENT OF COMMUNITY INVOLVEMENT 2021
(SCI)



The draft SCI sets out the Council's approach to enable 'community comment' and 'consultation' in the development of planning policy in determining planning applications. We focus here primarily on the former, in the context of developing the new local plan.

Overview

Comment and consultation alone do not constitute community involvement and therefore this is a wholly inadequate offering to enable residents and other stakeholders to have any meaningful say in the planning process at each stage. If the proposed changes mooted through the Planning White Paper come to fruition this SCI will leave residents absolutely voiceless, only able to 'comment' if this is still allowed on planning applications.

Indeed, **we are surprised that the Council has not made more of the importance of engagement in developing the new local plan.** If the Planning White Paper reforms - or anything resembling them - are legislated for, communities will have very little opportunity to object to individual planning applications if they conform with the local plan. So getting an acceptable local plan is vital.

Consultation principles and approaches

A. Meeting the requirements of the NPPF (2019: para 16) which states:

"Plans should:

- a) be prepared with the objective of contributing to the achievement of sustainable development;
- b) be prepared positively, in a way that is aspirational but deliverable;
- c) be shaped by early, proportionate and effective engagement between plan makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees;
- d) contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;
- e) be accessible through the use of digital tools to assist public involvement and policy presentation;
- and
- f) serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant)".

The draft SCI does not enable c) or demonstrate d).

B. [The Consultation Charter](#) recently adopted by the Council states:

“Consultation is just one element of community engagement and feedback and includes activities such as: complaints and suggestion schemes; interviews, polls, surveys and questionnaires; user and focus groups; public meetings and residents’ panels”

It was clarified through scrutiny that the charter applies to planning. Given that the SCI is about engagement rather than just consultation, the SCI should be rewritten to reflect this wider definition of engagement included in the adopted Charter.

C. Comment is not community involvement: only one aspect - *the least participative aspect of involvement*. The principles and approaches to community involvement - in planning policy, in major developments (Liveable Exeter in particular), Neighbourhood planning and individual planning applications should be set out in full. These should be developed further to a consultation exercise with communities and stakeholders, undertaken after the closure of this consultation.

This would be consistent with the Council’s own policy set out in part 3 of [Better Homes for Local People](#) (ECC, 2018) which includes approaches such as:

“Direct proactive engagement of a wide group of residents – through surveys, votes, and ‘door-to-door’ conversations. Involvement of residents in developing the detail of proposals – through specialist resident committees, forums, and workshops; steering groups with resident representation; and meetings of Tenant and Resident Associations and neighbourhood forums. Broader opportunities for residents to be kept updated and engage – through ‘drop-in’ days and public meetings; letter, email, and newsletter updates; and web-based consultation tools, such as Commonplace, or Online forums, such as Facebook pages for the estate.”

Though this guidance is written in relation to specific housing developments, it is highly relevant to building a local plan with wide community input.

To maximise the benefits of engagement and as a new way of getting them involved in planning, communities should be offered some training e.g. planning literacy and community mapping.

D. There should be continued engagement on developing the local plan between the formal statutory consultation stages. In particular:

- There should be bulletins - publicised prominently - on progress in producing the draft plans at least every 6 weeks and people should be actively encouraged to sign up to receive these directly.
- The officers working on the planning team should be accessible to community groups as well as consultants/developers. (We know from an FOI request that meetings between the team drawing the GESP and the latter groups vastly outnumbered those with the former.)

- Evidence documents used to inform the plan should be published as they are completed. It is not acceptable to hold these back until the formal draft plans are published as this requires people to read unfeasibly large amounts of information within the consultation timescale.
- The Council's Planning Member Working Group meetings are not open to the press and public. Its discussions impacting on planning policy should be minuted and published as a matter of course. The Strategic Scrutiny Community has responsibility for planning policy and as such should have a clear role in planning scrutiny of matters that emerge through the local plan process.

Neighbourhood planning

The draft SCI appears to have been prepared without reference to the Exeter Community Strategy, which strongly supports the promoting and the development of neighbourhood planning (and set out as a statement of policy in the Council's Annual Governance Statement).

[Government guidance](#) says that "A local planning authority should:

- be proactive in providing information to communities about neighbourhood planning.
- fulfil its duties and take decisions as soon as possible, and within statutory time periods where these apply.
- set out a clear and transparent decision making timetable and share this with those wishing to prepare a neighbourhood plan or an Order
- constructively engage with the community throughout the process including when considering the recommendations of the independent examiner of a neighbourhood development plan or Order proposal."

There is no evidence in the SCI that the Council is being proactive in informing communities of neighbourhood planning, even though such plans may be vital protections against a deregulated planning system of the type envisaged in the Planning White Paper.

Exeter Green Party, November 2021