



Jill Day
Exeter City Council
Civic Centre
Paris Street
Exeter, Devon. EX1 1JN

10th April 2017

Dear Ms Day

Greater Exeter Strategic plan : Statement of community Involvement (GESP SCI)

Thank you for attending a recent meeting of the Exeter Community Forum. I am pleased to respond on behalf of the Forum to present the issues we talked about for consideration as part of your consultation process.

Good consultation, done to the highest standards, is the proper way for decision-makers to hear the voices of those who will be affected by important proposals. This is of course vital as part of the planning process to enable existing and future communities to shape the communities and areas that will become their homes, work and leisure places.

Exeter Community Forum brings together community organisations to work together and strengthen our communities in Exeter and is a partnership with Exeter City council. Our aims are to:

1. Give a strong voice for community groups from across the different areas of the City.
2. Inform the allocation of the neighbourhood portion of the Community Infrastructure Levy accruing from Development in the City and consider other investment needs and opportunities for communities
3. Give a space for groups to share information and discuss opportunities for collaborative working around the delivery of local services and community assets
4. Support the creation of a community development strategy for the next five years to strengthen communities, and identify programmes that will best address the development needs of new and existing communities.
5. To identify common themes and priorities that will help inform decision making about and with communities in the City.
6. To keep abreast of national policy & initiatives
7. Communicate with and involve wider communities and key statutory and voluntary/community sector partners in the work of developing a community strategy.

You can see our terms of reference here: <http://exetercommunityforum.net/ecf-tor/>

Exeter Community Forum's full members are community associations or other local fora; many of whom have taken an active part in the planning process over recent years. A list of our full and associate members can be found here: <http://exetercommunityforum.net/about/members/>

We note the principles of consultation advocated by Stephen Sedley QC in the Gunning case:

- that consultation must be at a time when proposals are still at a formative stage.
- that the proposer must give sufficient reasons for any proposal to permit of intelligent consideration and response.
- that adequate time must be given for consideration and response and, finally,
- that the product of consultation must be conscientiously taken into account in finalising any statutory proposals.

Please find following a note of what we asked our members at our meeting and their responses. It should be noted that the comments from our discussions are based on the experiences of working with and involving communities in the planning process.

From your experience of involving the community and contributing to planning decisions and documents what does Exeter City Council do well and what could they do better?

- Individual offices really work hard at community / explaining example Paul Jeffrey's. They are 'straight' with community as is possible for them to be;
- Exeter City Council produce good documents but their processes are very top down – they need more early public engagement
- Are we ticking their box?
- I come from St James...
- Some more innovative developments not just same old houses built anywhere in the UK; but providing social housing
- They had workshops with us but not controlling Teignbridge development adequately (in south west Exeter master plan)
- Genuine consultation not just ticking a box – time, money and resources put into consultation at the appropriate at level appropriate to community
- people get very concerned when the development gets the go ahead but asking them to think about abstract Concepts at the early stage is a big ask from Exeter City Council but necessary

Does the draft SCI help people to shape the decisions that affect them?

- Draft says all the right things but at what point will people be consulted - after proposal to have been formulated?
- Allow who? It doesn't specify the weight and meanings that will be attributed to responses or how they will be considered alongside other material considerations or what is the reasoning behind a decision.
- if it says who? How? and when? they will consult but nothing about what they'll do with the consultation input. Who will acknowledge it? How will progress/uptake of [an] idea be reported? How will we know who's listening?
- From experience even if communities get involved they aren't giving power to shape decisions!
- Here! Here!! [in response to comment preceding] consultation results need to be discussed with Communities and explanation of why ignored!

Does the draft SCI help people to know what is going on?

- Yes – if community forums help disseminate information to a local level – this will help people do not read planning documents!
- Needs to be simplified and dates added
- Does not give enough information to inspire people to be involved
- Community groups and organisations can help spread the word about GESP but need resources to do so

- Only if you are already interested – not in everyday language and looks (arguably) boring to most people
- Would help to have an approximate timetable with official consultations periods in.
- Often its only when people/community hit a barrier, that they react. How do we handle that ‘barrier’ in a way that allows a creative involvement of lots of voices. How do we personalise it?
- Community groups and organisations can help spread the word about GESP but need resources to do so.
- Need limitations
- Limited accessibility for anyone with academic limitations?

Does the draft SCI give them an opportunity to seek redress if the process let’s them down?

- No! No obvious appeal procedure. No points in consultation!
- it's my only be possible to seek redress when plans are set before planning inspectors - what opportunity is there for people or organisations to challenge if their points are ignored?
- No. No explanation of how to challenge and where to go to. How do people get their rights? Who do the planners consider have a legitimate expectation and what governs them gunning crystal apply - explain them and refer to them!
Is there going to be a ‘rush’ of planning applications before the GESP?
- From experience with ‘Topsham Gap’ campaign, it's not just the draft SCI that doesn't give Communities the opportunity to seek redress - ultimate power in planning decisions doesn't lie with the District and City Councils.
- No just publishing comments is not redress.

In light of the above and the experience of the Exeter Community Forum in the development of the Exeter community strategy we would make the following observations on the draft SCI:

“Involvement will be open to all regardless of gender, faith, race, disability, sexuality, age, rural isolation and social deprivation”

1. It is that planning necessitates the use of technical and other jargon – however such words should be explained in lay terms and general documentation should be written in a straightforward way (the later point on jargon is noted).
2. That to ensure fuller participation by such groups the methods of consultation needs consideration for example a meeting in a town hall in the town centre is not likely to be an effective means to enable participation from a broad section of the community.

“We will undertake consultation when the plan is still at a formative stage”

3. People need to have confidence that plans may be influenced, so where pre-determined preferences are included these should be identified.

“We will choose consultation processes by balancing cost and time constraints, and our level of discretion on the outcome”

4. This is an unwelcome top down approach.
5. Consultations processes should be discussed and agreed in advance with community bodies; and objectives, processes and budgets agreed with them. These should be publically stated.
6. Community organisations should be funded to facilitate such processes where they are better placed to do so than the local authority.
7. That as part of this process discussions are held between the Council and strategic community infrastructure organisations in each district to share the GESP objectives and discuss how they might cooperate to enable and improve community involvement in the planning process, bearing in mind the differing contexts and experiences in each district and lack of formal collaboration across the GESP area by community organisations on planning matters.

“Consultation publications will be clear and concise and avoid unnecessary jargon, without understating the complexities of any decision.”

8. We agree. The decision making process should be set out explain who and how the decision will be made including any significant criteria which may not be subject to consultation.

“They will give sufficient reasons and information to allow an informed response. Enough time (usually 6 weeks) will be given for responses.”

9. An indicative timetable overall for the process and key decision points should be set out.
10. Within the stages a minimum of 6 weeks should set, especially considering the scope and spread of the communities in the GESP area a longer timetable might be needed.
11. Prior to any formal consultation period informal work is undertaken with community organisations to consider how best involve communities in the consultation process if not already done so.

“Responses will be considered conscientiously”

12. It is not clear by whom or how ‘conscientious consideration’ will happen,
13. What will happen or what process for redress is there if there is significant disagreement or if the respondent feels they have not been treated conscientiously?
14. How will responses be made? To the individual respondent (as the NHS does) or collated and shared publically, or both?

“We will inform people who respond to consultations of later stages”

15. This is welcome;
16. Are new contributors welcome and how will they be able to find out what has happened to date?

“Who we will consult”

17. The ‘weighting’ of any contributions are not set out. For example:
 - if a community organisation facilitates a community response to the process - is this more or less significant than that of a individual, or a third party with no local knowledge?
 - How are the views of existing communities that adjoin future communities to be considered. Especially where there may be more than one existing community – i.e. two or more distinct communities either side of a new proposed development?;
 - How the views of communities either side of a district boundary will be treated – as they may have very differing views on a new neighbouring development.
18. That the value and importance and role of community plans and neighbourhood plans as part of this process is clarified by Exeter City Council in light of the experience in St James.

“How we will consult”

“We will contact appropriate organisations and individuals directly” & “We will consider organising or supporting consultation events such as public exhibitions”

19. This is welcome, however what does ‘appropriate’ mean and who decides?
20. The process of consultation should be set out in advance and discussed with others – see points,5,6 & 7 above.
21. There are a range of creative and participative events that can be run other than exhibitions – which are very passive. Established means include planning for real, charrettes etc etc.

“Consultation documents will be made available for download on the Council’s websites and on the GESP website (www.gesp.org.uk) and will be available for purchase at a price reflecting publication costs”

22. We assume that there will be no charge for community organisations and no charge to download documents.

23. Documents should be available in accessible formats as required and no charge should be made where documents are required in accessible formats.

“We will publish comments received or a summary as soon as feasible.”

24. As part of each consultation stage what will happen to comments should be set out at the beginning

“We will explain how these comments have been taken into account when decisions are taken “

25. The decision making process should be set out explaining who and how the decision will be made including any significant criteria which may not be subject to consultation.

“After considering the initial consultation responses we will consult on the Draft Greater Exeter Strategic Plan”

26. This will need a detailed consultation phase, certainly longer than 6 weeks – maybe in stages, since I imagine that a wide range of views will be received, before the final plan can be developed.

27. It is not clear who ‘We’ is: is this each district Council, Devon County Council or another body that is overseeing the process?

In addition to the above one of members has brought the work of NHS consultation to our attention. Supported by Health Watch Devon the following statement of community involvement has been developed which sets out simply but in a fuller and more specific way an approach to consultation. Although focusing on Health services this could be a helpful guide for improving the GESP SCI

<https://healthwatchdevon.co.uk/wp-content/uploads/2017/02/What-to-expect-from-an-NHS-Public-Consultation-V2-DIGITAL.pdf>.

Exeter Community Forum would be willing to provide further comment on any revision made to the SCI.

Yours sincerely

Diana Moore
Chair
Exeter Community Forum