

# Greater Exeter Strategic Plan

## Draft Statement of Community Involvement Consultation Responses (27th February to 10th April 2017)

INDIVIDUAL/ ORGANISATION	WHAT ARE YOUR THOUGHTS ON THE DRAFT STATEMENT OF COMMUNITY INVOLVEMENT?
Devon Campaign to Protect Rural England	CPRE feels strongly that there needs to be much more transparency and public involvement during the next stage. At the very least, minutes of meetings should be published, and the meetings should be open to the public. The technical documents should be published as soon as they are available in order to allow time for public scrutiny.
Exeter Community Forum	<p>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.</p> <p>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.</p> <p>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:</p> <ol style="list-style-type: none"> <li>1. Give a strong voice for community groups from across the different areas of the City.</li> <li>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</li> <li>3. Give a space for groups to share information and discuss opportunities for collaborative working around the delivery of local services and community assets</li> <li>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.</li> <li>5. To identify common themes and priorities that will help inform decision making about and with communities in the City.</li> <li>6. To keep abreast of national policy &amp; initiatives</li> <li>7. Communicate with and involve wider communities and key statutory and voluntary/community sector partners in the work of developing a community strategy.</li> </ol> <p>You can see our terms of reference here: <a href="http://exetercommunityforum.net/ecf-tor/">http://exetercommunityforum.net/ecf-tor/</a></p> <p>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: <a href="http://exetercommunityforum.net/about/members/">http://exetercommunityforum.net/about/members/</a></p> <p>We note the principles of consultation advocated by Stephen Sedley QC in the Gunning case:</p> <ul style="list-style-type: none"> <li>• that consultation must be at a time when proposals are still at a formative stage.</li> </ul>

- 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 Jeffreys. 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:

- o 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?
- o 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?;
- o 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](http://www.gesp.org.uk)) and will be available for

	<p>purchase at a price reflecting publication costs”</p> <p>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.</p> <p>“We will publish comments received or a summary as soon as feasible.”</p> <p>24. As part of each consultation stage what will happen to comments should be set out at the beginning</p> <p>“We will explain how these comments have been taken into account when decisions are taken “</p> <p>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.</p> <p>“After considering the initial consultation responses we will consult on the Draft Greater Exeter Strategic Plan”</p> <p>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?</p> <p>In addition to the above one of members has bought 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 <a href="https://healthwatchdevon.co.uk/wp-content/uploads/2017/02/What-to-expect-from-an-NHS-Public-Consultation-V2-DIGITAL.pdf">https://healthwatchdevon.co.uk/wp-content/uploads/2017/02/What-to-expect-from-an-NHS-Public-Consultation-V2-DIGITAL.pdf</a>.</p> <p>Exeter Community Forum would be willing to provide further comment on any revision made to the SCI.</p>
Exeter Green Party	<p>The draft SCI proposes a traditional top-down consultation process. There is no sense of involving or engaging the community in plan-making, other than inviting responses to fully worked out drafts. The SCI fails to come up with ideas for facilitating real community engagement in a process that is often necessarily technical. However planning is at its core about making political choices, and so real engagement is essential.</p> <p>It would be good to use the development of the GESP as an exemplar of how to really engage people in planning. By their nature, planning documents are dry and technical and fail to attract widespread interest, and the exhibition at the Guildhall on 16 March was dreary. It’s common knowledge that people get worked up about specific developments at planning application stage, long after the policy has been settled. So could the four (five) councils spend some time thinking about how to go out and talk to communities about the emerging plan, long before it gets set in stone, and invite their active participation? In the same spirit, would the councils produce a summary analysis of the comments received on this first round of consultation, and the extent to which they have influenced work on the draft plan (and, where not accepted, why not)?</p>
Individual	This is such a momentous change for the Greater Exeter area that the issues should be put to the electorate via the ballot box. a "consultation" is not sufficient.
Individual	No mention of what happens if eg the Silverton village plan differs from the Greater Exeter plan especially where housing developments are concerned. Exeter has already approved massive housing developments around Pinhoe / Broadclyst etc . Very concerned that Mid Devon voices will be ignored if it suits Exeter . Places where Greater city areas have been approved have poor reputation of how they over rule those in the surrounding rural areas with prioritisation for investment in the city and doing what suits the city when it comes to putting unpopular building in the outlying towns and villages . I have relatives in Greater Manchester area ,

	<p>they live in a village outside the town of Rochdale both Town and village have seen massive housing building but at same time deterioration in infrastructure provision and investment in services from hospital to the town centre etc . Don`t want our town and villages in Mid Devon to end up the poor relations to Exeter in control. After all it is Exeter city council that says people should use public transport because of porr car access to Exeter but then decides to close the central bus station and open yet another leisure centre . I don`t know anyone who lives in or out of Exeter which thinks this is a good idea but they are going ahead anyway!!</p>
Individual	<p>It sets out a process which is entirely top-down. In other words, it states that the councils will "consult" on outputs (and there is no such thing as a "clear and concise" planning document), not *engage* with communities to design those outputs before they emerge. Councils need to learn the importance of making plan development interesting and engaging (the event at the Guildhall on 16 March was an example of how not to do it - a few boards, whereas active presentations would be more likely to grab attention). Without active and widespread public engagement in the plan-making process, we will see the usual rows over specific planning applications because people were not encouraged to get involved when the policies were being drawn up.</p> <p>So could the councils spend some time thinking about how to go out and talk to communities about the emerging plan, long before it gets set in stone, and invite their active participation? In the same spirit, would the councils produce a summary analysis of the comments received on the first round of consultation (on the regulation 18 document), and the extent to which these have influenced work on the draft plan (and, where not accepted, why not)?</p>
Individual	<p>There seems to be a stage missing - the plan to create a "Greater Exeter" is being formulated on the basis of the five local authorities involved determining that this is the way forward. What consultation has been carried out, or is intended to be carried out, to identify whether or not residents and businesses in these five local authority areas wish to develop into a "Greater Exeter" and the implications that could introduce a loss of local identities and local environments?</p>
Individual	<p>Who we will consult 6th bullet point Add "fully independent" before "consultants"</p> <p>How we will consult. 2nd bullet point Add "to all residents in all areas" after "leaflets" 3rd bullet point Add "hard copy" before "consultation documents..." 6th bullet point Replace "We will consider organising or supporting consultation events ..." with "We will organise and support consultation events if requested by Local Councils ..."</p> <p>7th bullet point Remove "or a summary" before "as soon as feasible"</p>
Individual (East Devon Resident & Lympstone Parish Councillor)	<p>I believe that the growth necessary to support economic development of Exeter should be spread around the city in all direction. Okehampton would probably benefit from more residents and it would be good to assess re-opening rail links there. The A376 is not of sufficient capacity to cope with any more commuter traffic and this should render Exmouth as not suitable for more large scale development.</p>
Individual (Member OSM Neighbourhood Plan group)	<p>The SOCI appears to encourage wide ranging consultation involving the public plus statutory bodies.</p> <p>My chief concern is with the overarching status of the GESP vis-a-vis other existing and emerging plans - especially Neighbourhood Plans, which have involved considerable public consultation and the concern is that 'local' wishes encapsulated in NPs can be over-ruled by the GESP. Consultation on the Ottery St Mary NP has generated a series of policy statements on housing, employment, education, infrastructure improvements, the environment, transport - which could well be 'trumped' by GESP and fly in the face of local area needs and opinion.</p>
Individual (Upottery Parish Councillor)	<p>We live in a capitalist society. Capitalism thrives on growth. I live in a small East Devon village of approx 35 properties which once upon a time had a pub, a school, a blacksmiths, a post office, a bus service to Taunton 6 days a week, a travelling library and a public telephone box. All of these amenities have now gone and there are two new houses in the village. Thankfully the village retains a village hall and an enterprising farmer manages to keep the village farm shop open.</p> <p>This description of a rural Devon village is typical of smaller settlements across the "Greater Exeter Area" and the loss of amenities signals the slow decline that many rural villages see today. This decline is driven by an assumed "bigger must be better" philosophy that pervades local and central government bureaucracy and is all too often the first law of private enterprise, partly because planners and entrepreneurs view the world through urban centric spectacles.</p>

	<p>In recent years my parish council thought that the coalition governments much vaunted “Neighbourhood Plan” process was a mechanism for local communities to have a much bigger say over the future of development in their neighbourhood. Our neighbourhood plan has however now been put on hold because the East Devon plan effectively designates all villages to be the same as open countryside with the exception of 14 villages where the East Devon Plan permits development. Clearly EDDC want to focus all development in East Devon into these 14 locations plus Cranbrook.</p> <p>Driven by Exeter’s need for growth, Cranbrook and the 14 identified locations in East Devon will be the only villages allowed to grow, thereby consigning all other villages to stagnate. This may suit the desire of urban based planners who see the countryside as an idyllic rural scene that should not be allowed to change, but in limiting growth in the majority of rural villages, the planners are defeating the stated aims of the Neighbourhood Planning process and ensuring that local communities cannot gain control over how their village grows.</p> <p>Rather than those qualified in town planning, control of development in rural villages should be given to the communities that live there and have to survive in these economically declining neighbourhoods because economic decline is what the East Devon Plan and the Greater Exeter Strategic Plan is condemning these small villages to for the foreseeable future.</p>
Natural England	<p>Thank you for your consultation on the above dated 27 February 2017 which was received by Natural England on 27 February 2017.</p> <p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>We are supportive of the principle of meaningful and early engagement of the general community, community organisations and statutory bodies in local planning matters, both in terms of shaping policy and participating in the process of determining planning applications.</p> <p>We regret we are unable to comment, in detail, on individual Statements of Community Involvement but information on the planning service we offer, including advice on how to consult us, can be found at: <a href="https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals">https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals</a>.</p> <p>We now ask that all planning consultations are sent electronically to the central hub for our planning and development advisory service at the following address: <a href="mailto:consultations@naturalengland.org.uk">consultations@naturalengland.org.uk</a>. This system enables us to deliver the most efficient and effective service to our customers.</p>
Woodland Trust	<p>We are not commenting on this aspect</p>