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**From:** Ashley <[REDACTED]>  
**Sent:** 10 December 2017 14:20  
**To:** EP&E Local Plan  
**Cc:** [REDACTED]  
**Subject:** Statement of Community Involvement

**Follow Up Flag:** Follow up  
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These are the comments from **Lanner Parish Council** on the consultation for Statement of Community Involvement.

There seem to be a number of grammatical or typographical errors which we've set out separately below.

The core problem with the document is that it fails to clearly differentiate between "engagement" and "consultation". Because it stresses "our focus will be engagement not consultation" it is imperative that this distinction is precisely defined: otherwise the whole paper is meaningless and open to any interpretation. Engagement is brought into the discussion under Planning Policy and it receives more attention here than anywhere else. Engagement in respect of larger planning applications is highlighted in the PACE process (4.1.1) but its significance, particularly for smaller planning applications seems uncertain.

The second big issue is that in stressing this "focus on engagement not consultation" it is unclear whether this means weight in decision making will be given to "engagement" where it wasn't before and how this will sit in the balance against "consultation". Is there a legal basis for different weighting? If weighting is given to "engagement" is this the same as giving weight to "pre-determination"? What happens if a developer and, say, a community group disagree on what took place in an "engagement"? To what extent (if any) are we opening up a legal can of worms?

If the underlining to the word "not" in the phrase "engagement not consultation" is removed, this will solve some of these problems. If it is simply a matter of Cornwall Council focussing its efforts on securing engagement then that is fine as it signifies a positive move to make the planning process more democratic. The underlining suggests, though, that what happens in the engagement process may have significance in the actual decision making. For example, an absence of vocal opposition in a PACE meeting, or an attempt to explore mediation options rather than simply oppose the principle of development, might be (wrongly) given weight as community support for a proposal. The strength of consultation is that it enables greater depth of thought and opportunity to test proposals against different interests and policies.

The other big issue with the document is the excessive amount of repetition. At risk of committing the same sin, all we really need is the difference between engagement and consultation, what weight might be applicable to both, and how they are applied in the formation of policy and then in the consideration of actual development proposals. It has been acknowledged that this document is an update/merging of several previous documents which could be why repetition through "copy and pasting" appears?

## **Main Content**

### **2. Community Involvement in Planning Policy**

For clarity, and to avoid what appears to be a strong bias against consultation which has not been well received, it is suggested that paragraph three be rewritten:

"Whilst the formal consultation process is necessary and adds value, Cornwall Council is committed to early and meaningful engagement, ensuring that proposals do their best for Cornwall. We understand that people will still have valid views at a consultation stage, but our focus will be on encouraging engagement. Through engagement, the Council gains valuable local knowledge and expertise and communities, along with other interested parties, gain insight into and a sense of ownership of development policies."

2.3.1 The first two sentences simply repeat what is in 2.2. In fact there is a great deal of repetition in this document.

2.3.2 Although entitled “Publicity and availability...” there is virtually nothing here about publicity. Using a website and (diminishing) libraries is not sufficient or effective publicity or availability. Why not use town and parish council offices or village halls, parish notice boards?

2.3.3 Everything here on in seems to be about consultation rather than engagement! There needs to be much more in this document about how engagement will work and how people (and organisations) can proactively take part . If a “new” concept is to be introduced and promoted, perhaps local councils could be employed to set up community meetings to get the concept across – starting in key communities and working out from there.

2.3.4 There seems to be an increasing and confusing (confused?) interchange between the words “engagement” and “consultation”. For example, in paragraph two of tis section we see “engagement during statutory consultation”! This does not inspire confidence and suggests a “pick and mix” approach. Shouldn’t the last item in this list – “meetings, workshops...” come first?

3.1 Should “through a local parish/town/city council” read “as a community”?

4.1 What is “enhanced” community engagement? This has not been spelled out here.

4.4.1 It should be made clear whether or not a comment made by post will be reproduced on the Council’s website.

Finally, there is no mention of engagement or consultation with regard to the Enforcement process. Perhaps there should be?

### **Proof Reading**

Introduction: “effects” should read “affects”.

, after “community” should be :

Insert , after “however”

Insert “and what” between “where” and “development” and delete “and what happens”

In second paragraph, insert . after “interested in planning”

1. Does “it” in paragraph two refer to Local Plan or Development Plan? What follows suggests that “It” is indeed the Development Plan.  
NDPs – delete “groups” and insert “communities”

2.3.3 insert , after “email addresses”

The use (and cost) of images which are quite unrelated to the text is, at best, irritating!

Kind regards

Ashley Wood

Chairman. Lanner Parish Council.

Lanner Village Hall



Sent from [Mail](#) for Windows 10