

# Cornwall Statement of Community Involvement



## Planning and Compulsory Purchase Act 2004

## Representation Form

**Please return your completed form**

by email: [localplan@cornwall.gov.uk](mailto:localplan@cornwall.gov.uk) OR

by post: Cornwall Council, Local Plans Team, Pydar House, Pydar Street, Truro TR1 1XU OR

by hand: New County Hall reception (Truro) or any Cornwall Council One Stop Shop  
**before 5pm on Monday 22<sup>nd</sup> January 2018**

### Fair Processing Notice

The feedback provided will enable Cornwall Council to finalise the Statement of Community Involvement and will be retained for the life of the plan. Full names and comments provided will be published online and in hard copy.

By completing the Representation Form and submitting it to the Council you are giving your consent to the processing of your personal data by Cornwall Council and that any information received by the Council, including personal data (but excluding personal contact details and any signatures), may be put into the public domain, including on the Council's website. Publication will not include any information which you provide on the accompanying Equality Monitoring Form which will be retained for up to three months from the close of the consultation.

### Part 1

#### Your contact details

You must complete this page for your representation to be accepted. The Council cannot accept anonymous representations.

Name: James Biscoe

Organisation (if applicable): .....

Address: [REDACTED]

Postcode: [REDACTED]

Email Address: [REDACTED]m

Telephone number: .....

If an agent, the individual or organisation you are representing:

.....  
 Please let us know whether you wish to be notified via the address/email address you have provided (or other specified address/email address) of the following for the Statement of Community Involvement:

- (i) The adoption of the Cornwall Statement of Community Involvement. **Yes**

**Part 2**  
**Your comments**

You may append additional sheets if you need more space to respond to any of the questions.

1. Please set out below any concern(s) you have with the Cornwall Statement of Community Involvement including any change(s) you consider necessary to address this concern(s).

You will need to say how the change(s) will address your concern(s) and it would be helpful if you could put forward your suggested revised wording to the text. Please also state which paragraph (s) your concern(s) and change(s) refers to.

Paragraph	Concerns, changes and reasons/evidence
Front cover	Why planning for Cornwall’s future? Why not Planning Cornwall’s Future? The first sounds very prescriptive for a process which, presumably, is meant to be inclusive and participatory? Or does this inadvertently give the game away?
1 Intro	The statement is obtuse. Planning implies making arrangements for future events which when they occur are the future.
Para 1	Planning affects everyone. I do not propose to copy edit the document but a glaring error at the first paragraph does not inspire confidence?
Para 1	<p>Para 1 is poorly written. What determines what and where development happens is developers (which come in different shapes and forms from a householder to a farmer to mega house builders and companies). Planning law and policy set the boundaries to what may be done and works towards an accommodation with developers.</p> <p>The NPPF does not set out policy it sets out broadly stated (vague?) aspirations of what government might be happy to see while concealing the policies behind smoke and mirrors. Actual policy is to build millions of houses to try and kick start the economy so rich companies, the banks and their shareholders get richer. Associated development is OK where it also boosts the policy above. If other considerations like landscape, tourism, environment, sustainability etc get in the way they will ultimately be ignored.</p> <p>The above is why ‘the local community should be engaged to reflect a collective vision’ and sorry about any inconvenient details which emerge afterwards when engagement becomes marriage.</p>

Paragraph	Concerns, changes and reasons/evidence
Para 1.1	<p>A good indicator of the approach is the issue of sustainability. Nowhere is any sort of definition provided in NPPF or associated policies and statements. When efforts were made to embody a definition in the Cornwall Local Plan there were rebuffed by the Inspector as being unnecessary. The result is that the vision of what Cornwall will look like in 15 or 20 years' time is particularly shrouded as regards sustainability. What is being sustained? Profits? Or, more likely, short term gains at the cost of future capacity, also known as a diminution of sustainability?</p> <p>DPD, SPD, NHP, all long on vision but short on consultation and process, analysis and details.</p>
Para 2	<p>Does involvement differ from engagement and consultation? Much is made herein about engaging as opposed to consulting. However, study of the document leads me to perceive that what is meant is engaging people and institutions in the process of consultation. The number who respond to this consultation for instance, will be an indirect indicator of the effectiveness of the engagement process.</p> <p>The wonderful statement that 'our focus will be engagement and <u>not</u> consultation' shows how woolly the thinking is. Engagement in what? Engagement in the process of consultation obviously? Thus the result sought is better consultation through greater engagement.</p> <p>What is missing here is analysis of why engagement in consultation is currently low and how this can be improved. Consultation is dull and tedious work which some people are willing to engage in for the benefit of better policies. The difficulty is that much of what is put forward by consultees is disregarded or just discarded. My comments at the beginning about the title page giving an indication of the process spring back to mind. The Council, driven and straitjacketed by HMG wants to consult but the results are often contrary to the received wisdom and so cannot be applied.</p> <p>How can engagement in consultation be improved? Two obvious routes are; increasing the number of Cornwall Councillors so that they better represent the voters who elect them (is this against HMG policy? Looks like it as they have decreed that the number of CC members shall shrink with no reasoning or justification given at all) and, work better with Parish and Town Councils. P&amp;TC's are good institutions with potential to improve representation of the people. Unfortunately they are stifled with the mass of other business which CC/HMG dump on them and (what really puts people off being Members) the processes of consultation are tedious and time consuming and, to add insult to injury their views are largely ignored.</p> <p>The advertising of consultations is weak and getting more so. Who hunts about on the CC website regularly to see what consultations might be coming along?</p>

Paragraph	Concerns, changes and reasons/evidence
	<p>The time schedule for many consultations is seemingly designed to minimise the number and thoroughness of responses so short time, often at Christmas/New Year or in August and commonly responses are pre programmed as multiple choice options and online so that consultees have no record of their responses. This all looks very much like tick box consultation. CC can tick the box saying we consulted. If less people respond that makes less work. Restricting distribution to existing e mail addresses on the CC database means that the same 'usual suspects' respond each time.</p> <p>A common outcome is that business interests employ agents or lawyers to represent them taking the process of consultation into a different realm. Of course CC and Inspectors like dealing with professionals as they talk the same talk. Outcome? Business carries the day and ordinary humans are swept aside as irrelevant. A few hardy souls do make representations at the examination in public but is there any evidence that they have any effects on the result? The inspector was scathing about the Cornwall Local Plan and caused much of it to be revised but little of that was occasioned by input from the consultees?</p>
Para 2	<p>Para 2.0 Engagement as it is practised is far from an open and transparent process of frankly exchanging information. It is a marketing exercise whereby developers get to persuade communities of the benefits of their proposals before ever revealing the details of what their proposals entail. Marketing, as we all know, is the process of encouraging or persuading people to buy things. The following definition courtesy of Google <i>'Marketing is the process of teaching consumers why they should choose your product or service over your competitors. If you are not doing that, you are not marketing.'</i> The objective is to maximise sales and thereby profits for those supplying the items marketed. Rational analysis of the pros and cons does not come into the issue it is all a matter of perceptions and decisions made on the basis of such. £4.99 is to all intents and purposes £5 but sells a lot of products.</p>
Para 2.1	<p>Para 2.1 starts the blurring process between engagement and consultation. Are you consulting or engaging? If they are consultees they must be consulted.</p>
Figure 2	<p>Figure 2 has a major flaw. At each stage it reports 'consideration of representations received' as a dead end. Where is revision of the plan in the light of representations received? Refer back to the consultees to clarify what is meant and their concerns? This absence shows the sterility of the representation process?</p>
Fig 3 and 4	<p>Figures 3 and 4 have the same fault.</p>

Paragraph	Concerns, changes and reasons/evidence
Para 2.3.2	<p>Para 2.3 2 I hope Lys Kernow is the principal office of the council not the principle office? All offices should have principles.</p>
Para 2.3.3	<p>Para 2.3.3 now we are onto consultation notification, engagement seems to have evaporated?</p> <p>Nothing in this section about organising the plethora of documents in an easy to understand way for people to comprehend.</p> <p>What are formal comments? Surely comments are comments? They need to be recorded so presumably in writing? Alternatively what are informal comments?</p> <p>Experience is that the responses from CC tend not to be very informative of the analysis (if any) on which they are based.</p> <p>Still no wiser about engagement and how it is to be achieved. What is described is the ordinary formal statutory consultation process. Better delete the notion of engagement?</p>
Para 3	<p>Paragraph 3 neighbourhood planning. Equally vision driven and nebulous ultimately subject to inspection and revision. NB 'requires support from CC'.</p> <p>What is the qualifying body? Qualify for what?</p> <p><b>'No statutory consultation required if area is a single parish.' Here is a massive flaw to start with?</b></p> <p>Put a notice in the local press and write to any consultation body mentioned in consultation statement . What are the consultation bodies if there is no statutory consultation required? How hard is it to write a consultation statement without mentioning any consultation bodies?</p> <p>And then there is a referendum on the result. Is 50% turnout required? 51% of those voting? Or can it all be kept low key and a low turnout ensure that what ever is in the neighbourhood plan is 'passed'? This needs a lot more thought to achieve a better result.</p>
Para 4	<p>Para 4 page 13 The process described has some important stages omitted. Validating the application to ensure that it is compliant with the various criteria to make it eligible to be considered. Advertising the application to the public as well as consultees. CC Still persist in the fallacy that a notice somewhere serves in sparsely inhabited areas and that letters to neighbours are necessary in closely populated areas. The use of e mail alerts has been curbed with no justification seemingly to ensure that not too many people comment on applications. Citing cost saving is absurd. What does it cost to have an extra name on an e mail list sent to in bulk? Advertising in the press has been curtailed allegedly to save</p>

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	<p>money, which is then wasted elsewhere. Community involvement suffers.</p> <p>Pre application is a waste of time and should be discouraged. See comments on marketing above. If developers want advice on what is likely to pass or not let them use a planning consultant or pay for an officers' opinion and then put in an outline planning application. Preapp just seeks to undermine the democratic process by weaselling around opinions and concerns to short circuit them when an application is made. That consultees like PC's are not allowed to comment on such preapps further neuters the system. It also costs money/time for PC's to process these things.</p> <p><i>"Involvement in the pre-application process provides the best opportunity to make a real difference to proposals". Not correct. How can you comment meaningfully on a proposal which does not yet exist through a process where you may not comment?</i></p>
Para 4	<p>Para 4 the key to this is the use of the term contentious. PACE is clearly a mechanism to sell contentious schemes to people who would otherwise resist them. It is not going to do much good as being preapp it is only talking visions and no details. When you have a proposal to discuss then there is something to discuss and worth having a meeting about. People know now that these vague events held so that developers can tick the box saying 'community involved' are not worth the ink to tick the box and know that the real business comes when an application is made. The ultimate decision is made by people who vote with their feet and don't buy/occupy undesirable developments. How many empty units are there in Camborne?</p> <p>The fact that Coastline (formerly Kerrier council house dept) are now mere property developers now is also an issue. They build under the banner of social housing and then sell on the open market as fast as they can, first the existing stock and then the new.</p> <p>What value is discussion with the electoral division member? They cover large areas now and will cover larger areas if their numbers are reduced and so do not have the hands on knowledge which used to be the case.</p>
Para 4.4	<p>Para 4.4 last bullet point is wrong. Getting onto the e mail list for planning applications is very difficult now even for Parish Councillors never mind other groups.</p>
Table 2	<p>Table 2 is wrong. Most applications now do not get into the press.</p> <p>Why does householder development not get a site notice? Are developments now being presented as householder development and then being contracted out to do the work?</p>

Paragraph	Concerns, changes and reasons/evidence
	<p data-bbox="411 286 549 320">SUMMARY</p> <p data-bbox="411 409 826 443">This document is poorly prepared.</p> <p data-bbox="411 445 1406 512">What seems to be the objective is to encourage people to engage in the consultation process.</p> <p data-bbox="411 515 1406 689">There are then all the PACE ideas which are frankly just to enable developers to say they consulted or engaged communities despite the fact that they only discuss fantasies or visions. Don't waste time or money on this. Only activate consultation when there is a proposal on the table (not a pre proposal), a full application or at least an outline application.</p> <p data-bbox="411 692 1015 725">I hope no money has been spent on this exercise?</p>