

Statement of Community Involvement

Consultation Statement

ID	Consultee Name/ Organisation	Page number Paragraph number	Consultee Comment	Officer CC Comment
1	Carlyon Parish Council	Page 15 Table 1	Town & parish councils should be included in consultations on tree and hedgerow applications	Comments noted.
2	Cury Parish Council	Page 17 Table 2	<p>My Parish Council would like the following amendment made to the proposed document.</p> <p>Table 2 Summary of Consultation Methods – Page 17</p> <p>It is imperative that Local Councils continue to be consulted on Householder applications and Minor Developments.</p>	<p>Comments noted</p> <p>Table 2 will be amended to ensure that local councils are consulted on minor development and householder applications.</p>
3	Derek Holley CC (Saltash East division)	4.1.1 and a column in the 4.3 table	<p>One comment only: there should be mention of the emerging importance of the CNA's (through the CNP's) as consultees in a range of matters. Perhaps in 4.1.1 and a column in the 4.3 table</p> <p>Please consult with the portfolio holder and Simon Mould....they are serious about this and it would be a good chance.</p>	Comments noted. Reference to Community Network Areas (CNAs) and local members will be made in paragraph 4.3.
4	David John Pollard	2.1 2.2 2.3.1	<p>You only engage with people opposing planning. I Have no objection to opposition, but a broader opinion is required.</p> <p>Who are 'General consultee bodies?' they are not elected and no not speak for the mass. Who does speak for the mass?</p>	<p>Comments noted.</p> <p>In addition to engagement with stakeholders etc, the Council also engages with elected members and local councils.</p>

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			<p>Sounds good, but no one is elected. Again planning was "Protracted but democratic". Sadly this seems no longer democratic. Focus groups, statutory consultees and community consultees are not elected. It also encourages "ward jumping" by councillors. Does this contravene the local *** ALT?. People pay community tax for community involvement by elected councillors (of all parties) who go there by the ballot box and sit on planning committees, this doesn't. I broadly support and agree with the remainder of the statement.</p>	
5	<p>Martin Mumford Designing Out Crime Officer Devon and Cornwall Constabulary</p>		<p>Re Statement of Community Involvement (SCI)</p> <p>Dear Sirs, Thank you on behalf of Devon and Cornwall Police for the opportunity to comment on the proposed changes to the above SCI.</p> <p>The basic principle of the SCI appears to be that planning should consult with and listen to all interested parties and ideally at the earliest stage possible this would of course be supported by ourselves and one that I in my role would seek to be actively involved in.</p> <p>However the new document in listing those whom the Council will consult with appears to indicate very few organisations compared with the currently adopted SCI.</p> <p>The Devon and Cornwall Police Authority and Police Designing out Crime Officers are not mentioned, albeit as stated with many other organisations and</p>	<p>Comments noted.</p> <p>The SCI does not spell out each organisation or body that is consulted, rather it provides general groups of consultation bodies that the Council will engage with, and this includes Devon and Cornwall Police Authority. Appendix 1 will be amended to make reference to the Police Authority (and others) along with a link to national guidance on consultees.</p>

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			<p>groups also omitted.</p> <p>We currently have an agreed protocol with the council over what planning proposals we are to be routinely consulted upon as below</p> <p>The DOCO's current Protocol, as agreed with the Planning Authority is as follows:-</p> <ul style="list-style-type: none"> • Major housing schemes of 10+ dwellings • Major commercial offices, industrial, retail or leisure schemes • New neighbourhood or district community facilities • Relevant shop front improvements • Proposals which include significant areas of open space/landscaping as part of a development, including linkage footpaths • Proposals incorporating significant off street car parking provisions • Proposals involving transport interchanges or other significant highway infrastructure • Improvements such as cycle lanes and new or improved footpaths • Relevant applications for Class A3, A4 and A5 food and drink uses • New or redeveloped schools and education premises • Where the intended occupants are particularly vulnerable and require higher standards of security to ensure their personal safety; care homes & drug rehabilitation centres for example • Gypsy and Traveller sites • ATM's • Large Solar Farms/Arrays 	<p>The content of the current protocol is noted.</p>

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			<ul style="list-style-type: none"> Any planning policy documents where community safety and security is relevant. This will include Neighbourhood Plans, Local Plans, Core Strategies and Supplementary Planning Guidance documents <p>I did speak to a very helpful lady involved from your office who verbally assured me that Police and others would still continue to be fully consulted in the future. Whilst this is reassuring I do feel that the omission of ourselves and others from the appendices does perhaps appear to indicate less not more consultation rather contrary to the overall ethos of the document.</p> <p>Clearly for Police not to be routinely consulted would raise serious questions regarding the issues of designing out crime and also future internal Police planning and strategy to meet local demand and growth.</p> <p>The Police Designing out Crime Officer (DOCO) is the single point of contact for the Planning Authority and others eg Architects, Developers and Public Appointed Officials for advice and recommendations on designing out opportunity for crime, fear of crime, antisocial behaviour (ASB) and conflict in the built environment.</p> <p>This is achieved by applying the attributes of Crime Prevention through Environmental Design (CPTED) and in so doing will ensure compliance with Section 17 of the Crime and Disorder Act (1998) (as referred to in the National Planning Practice Guidance</p>	

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			<p>(NPPG).</p> <p>Early intervention in the planning process can underline and justify the need for change with regard to the layout and design of new development. This follows a crime and ASB analysis, where relevant, by the DOCO to ensure new communities are as safe, secure and sustainable as possible.</p> <p>The DOCO will ensure that new development accords with the National Planning Policy Framework (NPPF) requirement - paragraph 17 (58 & 69) to;</p> <p>'Create safe and accessible environments where crime and the fear of crime do not undermine quality of life or community cohesion'</p> <p>Certainly if it were to be the Council intention not to include the Police as regular consultees for any reason I would require formal notification of this to ensure the Chief Constables Office and The Office of the Police and Crime Commissioner are made aware as soon as possible.</p> <p>I am though still assuming this will not be the case, but do feel it would be highly beneficial if the proposed appendices are similar to the currently adopted ones and show which organisations/groups will be consulted where deemed appropriate.</p>	
6	Gulval Village Community Association (GVCA)		While the wording and intentions of the document are supported the real issue is that the process is largely ineffective in practice in engaging and	Comments noted. The Council is committed to

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		<p data-bbox="544 979 667 1007">Para. 4.4</p> <p data-bbox="544 1241 645 1268">Table 2</p>	<p data-bbox="779 300 1491 520">involving the majority of local people who have little understanding of the planning process, especially the significance of the Plan preparation process. In particular the wording rings hollow given the extremely limited involvement of the local community in the preparation of the Cornwall Local Plan Site Allocations DPD.</p> <p data-bbox="779 560 1491 746">How does no public consultation between 2012 (when the documentation comprised wide ranging and very general 'options') and 2016 (when the approach and proposed Allocations were very firmly in place) constitute meaningful community involvement?</p> <p data-bbox="779 786 1491 911">How does a local Councillor Steering Group, not publicised in terms of content or progress or open to the public, constitute meaningful community involvement?</p> <p data-bbox="779 951 1491 1137">To have any credibility or value the Council has to be more realistic about the general lack of awareness and understanding of planning processes, and the consequent need to publicise this document and the various stages of the Plan preparation process much more effectively.,</p> <p data-bbox="779 1177 1491 1398">Consultation on planning applications once submitted. "Anyone can request a search for a particular type of application, an address or a parish and will receive an email notification when the Council receives an application meeting one or more of the search criteria;"</p>	<p data-bbox="1523 300 2042 392">encouraging early and meaningful engagement throughout the planning process.</p> <p data-bbox="1523 432 2042 557">Table 2 will be amended to ensure that local councils are consulted on minor development and householder applications.</p> <p data-bbox="1523 596 2042 689">Paragraph 2.1 sets out how an organisation or individual can be included on the consultation database.</p> <p data-bbox="1523 729 2042 853">The Council will use a variety of methods to publicise engagement and consultation, some of these are set out in paragraph 2.3.4.</p> <p data-bbox="1523 893 2042 1080">Electronic communication methods is just one form of communication used, other methods are used to ensure that those without access to electronic documents can do so through libraries or Council Offices etc.</p>

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			<p>SUPPORTED but how many organisations are aware of this opportunity? How is it to be publicised?</p> <p>(planning applications) Local councils not to be consulted on - Minor developments (less than 10 dw etc); CONCERNS - developments of less than 10 dwellings can be very significant in villages and many towns, Proposals for 8 or 9 dwellings would have a significant impact on most villages. CHANGE REQUIRED: Continue to consult Local Councils on Minor Developments.</p> <p>Introduction CONTINUED The SCI explains the process quite clearly but how many people, without some knowledge of the Planning system, would know it existed or where to find it. It was necessary to know it existed to be able to find this consultation on the Council website! Para. 2.1 of the Draft refers to the Council consulting "general consultation bodies" as well as statutory consultees, with further detail being set out in Appendix 1: Consultees. Appendix 1: Consultees defines "General Consultation bodies" as "Voluntary bodies some or all of whose activities benefit any part of the local planning authority's area".</p> <p>Para. 2.2 identifies that "there should be significant effort to engage people at the early stages of preparing planning documents, where there is greatest opportunity to influence policies and strategies."</p>	

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			<p>However, our experience of the current Local Plan process demonstrated that, despite being a properly constituted community association whose activities benefit part of the local planning authority's area, and who had expressed views and concerns relevant to the Plan preparation process from an early stage, we were not included in any relevant database until we had submitted a formal response to the October 2016 Public Consultation.</p> <p>Changes required:</p> <p>Notification to all households (with Council Tax bills etc) of proposed policy or Plan preparation in the coming year – including details of relevant stages and any planned consultations, and where to find information on the Council website or at an area office.</p> <p>2) Commitment to a genuine attempt to establish a database of local organisations and community groups or interested individuals throughout the Plan preparation process, and regular updates to those organisations throughout the process, to continue to raise awareness and promote understanding of the process.</p> <p>The database could be established via Community Network teams, local Councillors and Councils (all charged with a responsibility to publicise), prominent advertisements in local press - whatever was done in this respect for the Allocations DPD was not effective – and updated as and when the interest of 'general</p>	

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			<p>consultation bodies” or individuals becomes evident.</p> <p>3) Notifications of various stages of the Plan or policy to Parish Councils and local community organisations for display on community notice boards.</p> <p>4) A commitment not to bury the Plan process through its most significant stages of development in a closed Steering Group - the process must be open and transparent to the wider community at all stages.</p> <p>5) Preparation and wide community circulation of an A4 flier to raise awareness of the SCI, its relevance to community involvement in planning processes and where to find it.</p> <p>2 Para.4.4 Table 2 Consultation on planning applications CONTINUED Local Councils not to be consulted on Householder applications CONCERNS The impact of some Householder applications can be significant in smaller settlements as well as in Conservation Areas and the AONB CHANGE SOUGHT Continue to consult Local Councils on Householder applications.</p> <p>The implications of development proposals in outdated parish areas that include villages as well as a town should also be considered – in terms of community involvement and consultation the Council should not pursue a ‘blanket’ urban approach to such parishes; individual village communities should have a similar voice to those in rural parishes CHANGE SOUGHT The impact of a proposal, in terms</p>	

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			<p>of scale, on its location and the relevant community should be a factor in determining appropriate consultation.</p> <p>No neighbour consultation on - Departures from the Local Plan - Public right of way - Waste operations CONCERNS – this is an erosion of individuals’ awareness of developments that could have a negative impact on them CHANGE SOUGHT consultation with neighbours on these categories of development</p> <p>No site notice for - Householder applications CONCERNS Householder applications can have a significant impact in some situations; Site notices are important in raising public awareness. CHANGE SOUGHT site notices to be posted for Householder applications. In terms of resources, this could be implemented by providing the notice with acknowledgement of the application and requiring the applicant to display on site until the application has been determined.</p> <p>General comment CONCERN While the advantages of electronic communication are recognised there is a real risk of excluding significant numbers of people from the process because of the reliance on online communication. Those who do not have internet access or who would find responding online difficult must continue to have an equal opportunity to be</p>	

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			involved by other effective means.	
7	Eleanor Giggal (Town Clerk) Hayle Town Council	P.19, Appendix 1 Consultees P17 Table 2 Summary of Consultation methods	<p>Hayle Town Council requests that Town and Parish Councils be added to this list as they are consultees, although it is acknowledged that they are not statutory consultees.</p> <p>Hayle Town Council requests that this table be amended to include Minor Developments and Householder Developments in the 'Consultation with local council' column and that householder developments be included in the 'site notice' column</p>	<p>Comments noted, table 2 will be amended to ensure that local councils are consulted on minor development and householder applications.</p> <p>The SCI does not spell out each organisation or body that is consulted; rather it provides general groups of consultation bodies that the Council will engage with. Appendix 1 will be amended to make reference to include a link to national guidance on consultees.</p>
8	Pamela Lavelle Helston Town Council	Table 1 (4.3) Table 2 (4.4)	<p>Helston Town Council wishes to raise concern with the method of community engagement listed in Table 1 under paragraph 4.3 which omits discussion with the electoral division member for householder, Conservation Area Consent and Listed Building Consent applications.</p> <p>Members are also very concerned with the summary of consultation method listed in Table 2 under paragraph 4.4 which omits consultation with the local council for Minor Development and Householder Developments.</p> <p>Helston Town Council is very concerned that these exclusions are not in accordance with current consultation procedure and would be detrimental to the democratic process. Helston Town Council would</p>	<p>Comments noted. Paragraph 4.3 will be amended.</p> <p>Table 2 will be amended to ensure that local councils are consulted on minor development and householder applications.</p>

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			to advertising.	

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11	Lanner Parish Council		<p>These are the comments from Lanner Parish Council on the consultation for Statement of Community Involvement.</p> <p>There seem to be a number of grammatical or typographical errors which we've set out separately below.</p> <p>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 <u>not</u> 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.</p> <p>The second big issue is that in stressing this "focus on engagement <u>not</u> 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?</p> <p>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</p>	<p>Comments noted. The grammatical and typographical errors will be amended prior to adoption.</p> <p>The Council will consider amending paragraph 3 to reflect differences between consultation and engagement. An additional paragraph will be included to clarify the terms 'engagement' and 'consultation'.</p> <p>Consideration will be given to the amendment of paragraph 2.3.2 to read 'Availability of our documents' and publicity of our consultations via local councils' noticeboards.</p> <p>Paragraph 2.3.4 will be amended to read: 'The various methods of <u>publicising our consultation engagement during statutory consultations</u> that we could use are....'</p>

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			<p>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?</p> <p>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."</p> <p>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.</p>	

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			<p>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?</p> <p>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.</p> <p>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 this 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?</p> <p>3.1 Should "through a local parish/town/city council" read "as a community"?</p> <p>4.1 What is "enhanced" community engagement? This has not been spelled out here.</p>	

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			<p>4.4.1 It should be made clear whether or not a comment made by post will be reproduced on the Council's website.</p> <p>Finally, there is no mention of engagement or consultation with regard to the Enforcement process. Perhaps there should be?</p> <p>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"</p>	
12	James Biscoe	Front Cover 1 Intro	<p>The use (and cost) of images which are quite unrelated to the text is, at best, irritating!</p> <p>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? The statement is obtuse. Planning implies making</p>	<p>Comments noted. Consideration will be given to the use of images within the document.</p> <p>The grammatical and typographical errors will be amended prior to adoption.</p> <p>Engagement and consultation</p>

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		<p>Para 1</p> <p>Para 1</p> <p>Para 1.1</p> <p>Para 2</p>	<p>arrangements for future events which when they occur are the future.</p> <p>Planning affects everyone. I do not propose to copy edit the document but a glaring error at the first paragraph does not inspire confidence?</p> <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> <p>A good indicator of the approach is the issue of sustainability. Nowhere is any sort of definition</p>	<p>terminology will be clarified.</p> <p>Statutory consultations periods are set out in regulations, where these fall over bank holidays these may be extended.</p> <p>Table 2 will be amended to ensure that local councils are consulted on minor development and householder applications.</p>

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			<p>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> <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 not 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</p>	

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			<p>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&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> <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</p>	

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		<p data-bbox="544 619 633 643">Para 4</p> <p data-bbox="544 1209 658 1233">Para 4.4</p>	<p data-bbox="779 300 1489 355">options and online so that consultees have no record of their responses.</p> <p data-bbox="779 395 1458 579">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 data-bbox="779 627 1485 1042">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> <p data-bbox="779 1082 1485 1393">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 'Marketing is the process of teaching consumers why they should</p>	

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		Table 2	<p>choose your product or service over your competitors. If you are not doing that, you are not marketing.' 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> <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> <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> <p>Figures 3 and 4 have the same fault.</p> <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> <p>Para 2.3.3 now we are onto consultation notification, engagement seems to have evaporated? Nothing in this section about organising the plethora of documents in an easy to understand way for people to comprehend.</p>	

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		Para 4 page 13	<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> <p>Paragraph 3 neighbourhood planning. Equally vision driven and nebulous ultimately subject to inspection and revision. NB 'requires support from CC'. What is the qualifying body? Qualify for what? 'No statutory consultation required if area is a single parish.' Here is a massive flaw to start with?</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 whatever is in the neighbourhood plan is 'passed'? This needs a lot more thought to achieve a better</p>	

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			<p>result.</p> <p>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?</p> <p>Advertising in the press has been curtailed allegedly to save 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. "Involvement in the pre-application process provides the best opportunity to make a real difference to proposals". Not correct.</p>	

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			<p>How can you comment meaningfully on a proposal which does not yet exist through a process where you may not comment?</p> <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> <p>Para 4.4last bullet point is wrong. Getting onto the e</p>	

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			<p>mail list for planning applications is very difficult now even for Parish Councillors never mind other groups.</p> <p>Table 2 is wrong. Most applications now do not get into the press. 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> <p>SUMMARY</p> <p>This document is poorly prepared.</p> <p>What seems to be the objective is to encourage people to engage in the consultation process.</p> <p>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>I hope no money has been spent on this exercise?</p>	
13	Launceston Town Council	2.1 Figure 4 page 7	<p>Town Councils must be listed as a statutory consultee</p> <p>Town councils must be shown as interested parties in the pre- production/ evidence gathering stage.</p>	<p>Comments noted.</p> <p>Table 2 will be amended to ensure that local councils are consulted on minor development and householder applications.</p>

ID	Consultee Name/ Organisation	Page number Paragraph number	Consultee Comment	Officer CC Comment
		<p>Para 2.3.2</p> <p>Para 4.1.1</p> <p>Table 1 PACE 15</p> <p>Para 4.4</p> <p>Table 2 Para 17</p>	<p>Both of the above are important to ensure that local councils are involved in the process throughout and recognised as part of the process</p> <p>The council has concerns regarding the availability of documents and community network panels should work with local councils to ensure residents are fully informed</p> <p>The council supports the proposal of community pre applications but has some concerns over the cost of the PACE forums as they may be off putting or unachievable for some smaller developers.</p> <p>Town Councils should be included in all application types</p> <p>Neighbourhood notifications, neighbours who live opposite or behind a property with a proposed application should be included as notified parties</p> <p>Town Councils should be included in all consultation methods</p>	
14	Lostwithiel Town Council		Lostwithiel Town Council supports Cornwall Council supports Cornwall Council in its efforts to engage with businesses, community groups, landowners, developers, residents and public sector organisations as expressed in the October 17 version of state of community involvement for planning.	Comments noted.
15	Madron Parish Council		In 4.1.1 (PACE) the levels of engagement describe the involvement of Local Councils but do not define who this is. If it is intended to cover Parish, Town,	Comments noted. Add definition of 'Local Council' to clarify that this includes City, Town and Parish

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			<p>City then it should be specific. Local Council is too vague a term.</p> <p>The levels of engagement refers to local members and local residents attending and participating in Forums. Is the intention to have representative numbers or open to anyone? If the former, how are they to be chosen?</p> <p>We have interpreted the Section 4.3 table 1 as applying to engagement in the pre-application process and Section 4.4 table 2 as applying to the consultation on submitted applications.</p> <p>This would be clearer if Section 4.3 and table 1 were titled "Engagement in Pre-applications". At the moment the only clue to what is being proposed is in the use of the terms "engagement" in 4.3 and "consultation" in 4.4.</p> <p>Assuming our interpretation is correct, cutting out the Parish from the consultation process for all minor and householder applications would remove the safeguard of local knowledge from the consultation process. If the community engagement at the pre-application stage was full and meaningful and proposed applications were sorted out prior to formal submission then one might think there was no need for further Parish involvement but the reality seen by us is that pre-applications to date are generally lacking in anything other than a vague outline of a proposal. It is only with the formal application that we get to see useful details such as design statements, attention to drainage, etc. The Planning</p>	<p>councils.</p> <p>Table 2 will be amended to ensure that local councils are consulted on minor development and householder applications.</p>

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			<p>Authority must significantly improve the content of pre-applications in order to make this proposal work.</p> <p>If the Parish Council will only be involved at the engagement stage with pre-applications, and not a consultee on submitted applications, then unless pre-applications become mandatory the Parish will be cut out completely from the majority of householder or single dwelling proposals, and there will be little engagement, as to date pre-apps are a rarity and not the norm here in Madron.</p>	
16	Marine Management Organisation		<p>The Marine Management Organisation (MMO) is a non-departmental public body responsible for the management of England's marine area on behalf of the UK government. The MMO's delivery functions are; marine planning, marine licensing, wildlife licensing and enforcement, marine protected area management, marine emergencies, fisheries management and issuing European grants.</p> <p>Marine Licensing Activities taking place below the mean high water mark may require a marine licence in accordance with the Marine and Coastal Access Act (MCAA) 2009. Such activities include the construction, alteration or improvement of any works, dredging, or a deposit or removal of a substance or object below the mean high water springs mark or in any tidal river to the extent of the tidal influence. You can also apply to the MMO for consent under the Electricity Act 1989 (as amended) for offshore generating stations between 1 and 100 megawatts in England</p>	Comments noted.

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			<p>and parts of Wales. The MMO is also the authority responsible for processing and determining harbour orders in England, and for some ports in Wales, and for granting consent under various local Acts and orders regarding harbours. A wildlife licence is also required for activities that that would affect a UK or European protected marine species.</p> <p>Marine Planning As the marine planning authority for England the MMO is responsible for preparing marine plans for English inshore and offshore waters. At its landward extent, a marine plan will apply up to the mean high water springs mark, which includes the tidal extent of any rivers. As marine plan boundaries extend up to the level of the mean high water spring tides mark, there will be an overlap with terrestrial plans which generally extend to the mean low water springs mark. Marine plans will inform and guide decision makers on development in marine and coastal areas. On 2 April 2014 the East Inshore and Offshore marine plans were published, becoming a material consideration for public authorities with decision making functions. The East Inshore and East Offshore Marine Plans cover the coast and seas from Flamborough Head to Felixstowe. For further information on how to apply the East Inshore and Offshore Plans please visit our Marine Information System. The MMO is currently in the process of developing marine plans for the South Inshore and Offshore Plan Areas and has a requirement to develop plans for the remaining 7 marine plan areas by 2021.</p>	

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			<p>Planning documents for areas with a coastal influence may wish to make reference to the MMO's licensing requirements and any relevant marine plans to ensure that necessary regulations are adhered to. For marine and coastal areas where a marine plan is not currently in place, we advise local authorities to refer to the Marine Policy Statement for guidance on any planning activity that includes a section of coastline or tidal river. All public authorities taking authorisation or enforcement decisions that affect or might affect the UK marine area must do so in accordance with the Marine and Coastal Access Act and the UK Marine Policy Statement unless relevant considerations indicate otherwise. Local authorities may also wish to refer to our online guidance and the Planning Advisory Service soundness self-assessment checklist. Minerals and waste plans and local aggregate assessments</p> <p>If you are consulting on a mineral/waste plan or local aggregate assessment, the MMO recommend reference to marine aggregates is included and reference to be made to the documents below:</p> <ul style="list-style-type: none"> • The Marine Policy Statement (MPS), section 3.5 which highlights the importance of marine aggregates and its supply to England's (and the UK) construction industry. • The National Planning Policy Framework (NPPF) which sets out policies for national (England) construction minerals supply. • The Managed Aggregate Supply System (MASS) which includes specific references to the role of marine aggregates in the wider portfolio of supply. 	

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			<ul style="list-style-type: none"> The National and regional guidelines for aggregates provision in England 2005-2020 predict likely aggregate demand over this period including marine supply. <p>The NPPF informed MASS guidance requires local mineral planning authorities to prepare Local Aggregate Assessments, these assessments have to consider the opportunities and constraints of all mineral supplies into their planning regions – including marine. This means that even land-locked counties, may have to consider the role that marine sourced supplies (delivered by rail or river) play – particularly where land based resources are becoming increasingly constrained.</p>	
17	Mullion Parish Council		<p>Page 17 states that the Local Council will no longer be consulted on householder applications or applications for minor development (1-9 houses). Is this correct? It seems very strange to not consult Parish and Town Councils on new housing developments.</p> <p>My Parish Council would like the following amendment made to the proposed document.</p> <p>Table 2 Summary of Consultation Methods – Page 17 It is imperative that Local Councils continue to be consulted on Householder applications and Minor Developments.</p>	<p>Comments noted.</p> <p>Table 2 will be amended to ensure that local councils are consulted on minor development and householder applications.</p>
18	Natural England		<p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed</p>	Noted.

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			<p>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: https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals.</p>	
19	Padstow Town Council	<p>Table 2 on page 17</p> <p>Section 2 page 5-9</p>	<p>Concern with the number of un-ticked boxes which means no site notices for householder developments these are often the only way some residents were aware an application had been submitted, no consultation with local council on minor developments (1-9 homes) or householder developments even though local councils are a statutory consultee, no neighbourhood notification on developments affecting public right of ways or departure from the development plan.</p> <p>There is a need to differentiate throughout the document, but particularly in section 2, between 'engagement' and 'consultation'. This could need substantial re-drafting in parts.</p>	<p>Comments noted.</p> <p>Table 2 will be amended to ensure that local councils are consulted on minor development and householder applications.</p> <p>Engagement and consultation terminology will be clarified.</p>

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		<p>Figure 5 page 11</p> <p>Paragraph 4.1 page 13</p> <p>Table 1 on page 15</p> <p>Page 14 14.1.1</p>	<p>In particular, discussions on pre-applications is 'engagement' and discussions on planning applications is 'consultation'.</p> <p>The blocks have been drafted, one for each regulation, which is not necessarily very helpful. In our opinion, the last paragraph of the first block "The community will engage Statement. "should be in a separate block. Although only one paragraph, this is where the most work has to be done. It should be highlighted. The first main section should be titled 'Community engagement' and the second and subsequent sections 'Community consultation'.</p> <p>should be headed' advice and engagement'. The last main paragraph states 'Involvement in the pre application process provides the best opportunity to make a real difference to proposals.' Members of the public should have the same facilities available to them to comment on pre-applications as they do on full planning applications.</p> <p>Should be indicative and not be set in stone. For example, it may be necessary to consult with the local member whatever the type of application, despite there being six blank boxes in that column.</p> <p>This should link to the Town and Parish Councils in Cornwall A model approach to pre-application discussions.</p>	

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20	Pentewan Valley Parish Council		<p>The parish council supports the document but would like to see the following amendments:</p> <p>1 definition of 'relevant authority'</p> <p>2, Under community engagement in applications, town and parish councils should be included in the engagement process for all applications</p> <p>3, Under consultation methods, town and parish councils should be consulted on all application (currently the proposal is to exclude minor developments and householder applications.</p>	<p>Comments noted.</p> <p>Table 2 will be amended to ensure that local councils are consulted on minor development and householder applications.</p>
21	Save Heamoor from Excess Development		<p>Reasons/evidence</p> <p>Our representation on the Statement of Community Involvement is prompted by our experience of the Council's lamentable track record in this area. There was a total failure by the Council to engage with the residents of Heamoor village about the housing development proposals in the emerging Allocations DPD.</p> <p>Those proposals call for a total of 719 new housing units, increasing the population of the village by over 50% and virtually doubling the built area.</p> <p>Notification of the Regulation 18 consultation was wholly inadequate. Residents whose properties adjoin the proposed development sites were not notified. A leaflet drop was organised at Heamoor Primary School but did not take place until 3.45pm on the final day of the consultation period. When it came to the Regulation 19 consultation, it was largely through the efforts of volunteers from the</p>	<p>Comments noted.</p> <p>Early engagement in the process is vital in seeking local knowledge.</p> <p>Hard to reach groups should be engaged, the document will be amended.</p> <p>The document will be amended to make reference to the Council publicising policy consultations via local councils. During the statutory stages Cornwall Council are required to notify certain bodies about the consultation. The Council will also publicise consultations in other ways.</p> <p>It is agreed that the Council has a duty to involve local communities and aims to do this at an early stage.</p>

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			<p>SHED campaign that local residents were made aware of the proposals and encouraged to make representations.</p> <p>The first face-to-face engagement with Council representatives did not take place until four weeks into the Regulation 19 consultation period, at a meeting requested and organised by our campaign group (and paid for by donations from local residents).</p> <p>Even then, the Council promised – but failed – to send officers with responsibility for traffic and flooding, two of the key concerns of local residents. A face-to-face meeting with those officers did not take place until three days before the end of the consultation period, and only nine local residents were permitted to attend that meeting.</p> <p>The failure to engage with local residents has left our community feeling disenfranchised, and denied us the opportunity to influence the proposals before they reached a near final stage, contrary to the requirement in paragraph 155 of the National Planning Policy Framework for “early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses”.</p> <p>3</p> <p>At the same time, the Council missed out on the opportunity to learn at an early stage and at first hand from people with detailed local knowledge about the problems that make the Heamoor sites unsuitable for large-scale residential development.</p>	<p>Although it is widely recognised that the internet is a good tool to disseminate information, however the Council recognises that this is not the only means of providing information and will use other mechanisms such as notices, media articles and press releases.</p> <p>Table 2 will be amended to ensure that local councils are consulted on minor development and householder applications.</p> <p>Amend Figure 5 to make reference to the requirements of Regulation 14 “in a manner likely to bring it to the attention of people who live, work or carry on business in the neighbourhood area”.</p> <p>The Council is committed to encouraging community involvement and will encourage applicants to undertake early engagement.</p> <p>Amend paragraph 4.4 Press notice to make it clear that certain applications are advertised in the local press.</p>

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			<p>As a consequence, the Council and our campaign group are now having to expend significant resources (on a purely voluntary basis in our case) preparing for and attending two days of examinations in public, addressing fundamental issues that should have been raised years ago.</p> <p>Our proposed changes to the draft Statement of Community Involvement are intended to help ensure that no other community in Cornwall ever has to go through the experience that Heamoor has suffered during the last twelve months.</p> <p>We have also become aware through our campaign that many people are excluded from any engagement with the planning process because they do not have internet access.</p> <p>Of our hundreds of supporters, around 20% are not connected to the internet, usually because they are from an older demographic.</p> <p>These people are effectively excluded from decisions about Council policy, even though they often have a lifetime's knowledge of their local community and neighbourhood. We have responded by using alternative means of communication, such as letter drops and door-to-door visits, to inform these people and encourage them to express their views.</p> <p>The Council should reach out to such people, not exclude them. This would be consistent with the commitment contained in the Council's previous Statement of Community Involvement (2011) to engage "hard to reach groups", which does not appear in the 2017 draft version.</p>	

ID	Consultee Name/ Organisation	Page number Paragraph number	Consultee Comment	Officer CC Comment
		Paragraph 2.1	<p>We believe that our proposed changes to the Draft Statement of Community Involvement go some way towards addressing this engagement deficit.</p> <p>Unless these changes are made, the 2017 Draft Statement of Community Involvement would fail to meet the criteria laid down in the statement of principle in paragraph 155 of the 2012 National Planning Policy Framework, as cited on page 3 of the 2017 draft: "The planning system should be easier to understand, more accessible and with a commitment to involving all who are interested in planning... Early and meaningful engagement and collaboration with neighbourhoods, local organisations and community is essential. A wide section of the community should be proactively engaged, so that local plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of an area, including those contained in any neighbourhood plans that may have been made."</p> <p>4. Our proposed changes are described in detail below, but the main points can be summarised as follows:</p> <ol style="list-style-type: none"> 1. Require direct individual notification of residents at the vital engagement and consultation stage, not just at the planning application stage. 2. Include a summary of current planning policy matters with the annual council tax notification sent to all households. 3. Require publication of all planning notices in a local newspaper and on designated community noticeboards. 	

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			<p>We have also proposed a number of other changes to clarify text which is potentially misleading or insufficiently clear. These are also described in detail below.</p> <p>Finally, we propose that in the interests of community and resident engagement, neighbour notification and consultation with the local council should be extended to all types of planning application without exception.</p> <p>DETAILS OF PROPOSED CHANGES</p> <p>Engagement – General Concerns: The Council’s track record on this is poor (see Reasons/ Evidence above).</p> <p>As a general principle, the Council should make the effort to inform all residents of the current status of planning policy. This could be achieved by including a plain English planning policy summary with the annual council tax notification sent to all households, which would provide information about:</p> <ul style="list-style-type: none"> - any local plans or development plans in preparation, with details of how to get involved in engagement or consultation processes and the expected timescales; - any neighbourhood plan affecting the local area, the current status of that plan, and how to get involved in shaping it; - how to find out about planning applications in your area; - a simple form to request notifications about planning matters (engagement, consultation and planning applications), either by e-mail or post. <p>5 Proposed change: Insert the following paragraph at the end of</p>	

ID	Consultee Name/ Organisation	Page number Paragraph number	Consultee Comment	Officer CC Comment
			<p>Paragraph 2.1: “We will also distribute to all residents an annual planning summary giving details of engagement, consultations and neighbourhood plans affecting their area, including information about how to get involved and a form to request notifications about planning matters.”¹</p> <p>2.3.1 Engagement – Residents in affected communities</p> <p>Concerns: The Council’s track record on this is poor (see Reasons/ Evidence above)</p> <p>In Paragraph 2.2 the Council says: “... we consider that there should be significant effort to engage people at the early stages of preparing planning documents, where there is greatest opportunity to influence policies and strategies”.</p> <p>Paragraph 2.2 continues “Figures 2 to 4 set out ... how we will engage residents and interested parties”.</p> <p>In fact, figures 2 to 4 do not mention residents and how they will be engaged at a sufficiently early stage to have a meaningful say on emerging planning documents. They merely refer to “early engagement with interested parties through meetings, focus groups and involvement in evidence gathering”.</p> <p>There is no indication as to how or when residents will be notified of any planned engagement, particularly residents who might be materially affected by emerging development plan documents.</p> <p>Proposed change We propose that Paragraph 2.3.1 be amended to include an obligation for the Council to engage directly and early with residents affected by</p>	

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			<p>proposals in an emerging development plan document. This should take the form of written notification to all residents of properties in communities or settlements where one or more potential development sites are being considered for inclusion in a development plan document.</p> <p>The Council has a duty to involve local residents as early as possible, and this cannot be done unless they are actually notified. Such an approach is consistent with the spirit and letter of paragraph 155 of the NPPF.</p> <p>SHED regards this as crucially important in light of Policy 1 of the Local Plan Strategic Policies, which states that “planning applications that accord with the policies in this Local Plan and supporting Development Plan (including, where relevant, with policies in Neighbourhood Plans) will be regarded as sustainable development and be approved, unless material considerations indicate otherwise”.</p> <p>Because of this presumption that policies in a development plan are “sustainable”, affected residents who are not notified of a proposal contained in a development plan until they receive neighbour notifications at planning application stage are denied the opportunity to challenge that proposal on “sustainability” grounds.</p> <p>1 NB All suggested amendments are in bold, deletions in strikethrough</p> <p>6-We therefore propose adding the following text at the end of Paragraph 2.3.1:</p>	

ID	Consultee Name/ Organisation	Page number Paragraph number	Consultee Comment	Officer CC Comment
			<p>“All residents in a community or settlement where one or more potential development sites are being considered for inclusion in a development plan document will be individually notified of the fact in writing and informed about all relevant community engagement measures.”</p> <p>2.3.3 Consultation notification – Residents in affected communities Concerns: The Council’s track record on this is poor (see Reasons/ Evidence above) In order to ensure proper consultation of residents affected by development proposals, we propose a similar change to the wording of Paragraph 2.3.3. Currently, this paragraph sets a minimum requirement of notifying statutory and general consultee bodies and “anyone who has asked to be notified”. This sets the bar too low for the Council. As things stand, unless residents have specifically asked to be notified, they may not be aware that a consultation is taking place and hence may not participate even if they are directly affected by the development proposals. Consultation is meaningless unless people are properly notified that it is taking place. Proposed change We therefore propose that the end of the first sentence of Paragraph 2.3.3 be amended as follows: “...along with anyone who has asked to be notified of the consultations and all residents of communities or settlements where there is a proposed site</p>	

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			<p>allocation.”</p> <p>Figures 2 & 3 Similar changes should also be made to the wording of Figures 2 and 3 to incorporate the need to notify residents, both at the early engagement stage and at the consultation stage. Proposed changes to Figures 2 and 3: 1. Amend Figure 2, “Community Involvement section”, as follows: Pre-production stage/evidence gathering “Early engagement with interested parties through resident notification, meetings, focus group and involvement in evidence gathering” Public participation in the scope of the DPD (minimum 6 week consultation) <input type="checkbox"/> Send out notifications to consultee bodies, residents of the communities or settlements affected, and those who have asked to be notified of consultations</p> <p>7 Publication of DPD public consultation (minimum 6 week consultation) <input type="checkbox"/> Send out notifications to consultee bodies, residents of the communities or settlements affected, and those who have asked to be notified of consultations</p> <p>2. Amend Figure 3, “Community Involvement section”, as follows: Pre-production stage/evidence gathering “Early engagement with interested parties through resident notification, meetings, focus group and involvement in evidence gathering”</p>	

ID	Consultee Name/ Organisation	Page number Paragraph number	Consultee Comment	Officer CC Comment
			<p>Publication of the draft SPD public consultation (minimum 4 weeks consultation)</p> <p><input type="checkbox"/> Send out notifications to consultee bodies, residents of the communities or settlements affected, and those who have asked to be notified of consultations</p> <p>3.2 Seeking formal comments Concerns: Ineffective and discriminatory consultation The various methods described in Paragraph 2.3.4 lead to social exclusion by discriminating against people without internet access.</p> <p>We believe that all residents should have an equal opportunity to be informed about, and comment on, proposals that affect them.</p> <p>Press releases are not sufficient because local media may choose not to publish a related article. Leaflets and posters in libraries are also ineffective: many libraries have closed, and older residents and those with impaired mobility (often the same people as have no internet access) may find it difficult to visit libraries, especially people who live in rural areas.</p> <p>The "value-for-money" objection to press notices in Paragraph 2.3.4 is ill-conceived. The Council should of course always seek to obtain value for money for Council taxpayers, but not at the expense of proper public engagement. In the interests of social inclusion and equal access the Council should advertise all consultation notices in the press.</p>	

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			<p>Proposed changes – Publication of notices</p> <p>Amend paragraph 2.3.4. to delete the “value-for-money” objection to press notices, and to require consultations to be publicised through (i) official notices placed in a local newspaper and (ii) notices placed on designated community noticeboards.</p> <p>The latter proposal could be achieved by liaising with local representatives (eg county/parish/town councillors) to identify a location (in most communities, this could be an existing location such as a church or shop noticeboard) for an officially designated community noticeboard.</p> <p>8-This would have the additional benefit of providing a community focus and talking point for matters affecting local residents, especially for those with no internet or social media presence.</p> <p>We therefore propose amending Paragraph 2.3.4 as follows:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Press releases and notices – news releases for local media to raise awareness and interest, and publication of an official notice in a local newspaper before the start of the consultation period; <input type="checkbox"/> Statutory Notices – certain regulations require the use of statutory notices in the local press, setting out the consultation details. However, these are expensive and are not considered to provide value for money on every occasion; <input type="checkbox"/> Leaflets and posters – will display information 	

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		Table 2 4.4	<p>concerning a consultation in public and community buildings such as libraries, and on designated community noticeboards;</p> <p>4.1-Community involvement in Neighbourhood Planning Concerns: Ineffective and discriminatory consultation The concerns expressed above regarding development plan documents also apply to notification/consultation about neighbourhood plans.</p> <p>Specifically, the section of Figure 5 relating to Regulation 14 consultations requires the community preparing the plan to "<input type="checkbox"/> Publicise the plan within their parish". This falls short of the requirement contained in Regulation 14 itself that this should be done "in a manner that is likely to bring it to the attention of people who live, work or carry on business in the neighbourhood area." This Regulation 14 text should be added to Figure 5 in the interests of clarity.</p> <p>The text in Figure 5 on Regulation 16 and referendum consultations should also be amended to extend the requirement to publicise beyond the websites of Cornwall Council and the local council, to include the posting of notices on designated community noticeboards and (in the case of the referendum notice) in the local press.</p> <p>Proposed changes</p> <p>Figure 5, Regulation 14, amend text as follows: <input type="checkbox"/> Publicise the plan within their parish in a manner</p>	

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			<p>that is likely to bring it to the attention of people who live, work or carry on business in the neighbourhood area.</p> <p>Figure 5, Regulation 16, amend text as follows: <input type="checkbox"/> Put a notice in the local press and on designated community noticeboards and write to any consultation body who is referred to in the consultation statement.</p> <p>9- Figure 5, Referendum on Neighbourhood Plan, amend text as follows: <input type="checkbox"/> Publish the notice of referendum on our website, ask the relevant local council to do the same, and place the notice in the local press and on designated community noticeboards.”</p> <p>4.1.1 Pre-application advice and consultation</p> <p>Concern: Misleading information</p> <p>The pre-application procedure is optional, as is made clear in the Council’s Pre-Application Community Engagement FAQs: “If proposals are sensitive to the wider community do they have to be subject to the Forum process?</p> <p>No. Whilst developers will be encouraged to use this opportunity when appropriate to be able to demonstrate their engagement with the community, it is not mandatory and it will depend upon their co-operation and willingness to take part.” However, this is not made clear in Paragraph 4.1 of the draft Statement of Community Involvement,</p>	

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		Table 2	<p>which does not explicitly state that this process is dependent on developer co-operation (and willingness to pay), and therefore might create a legitimate expectation on the part of residents that residents will be involved in pre-application engagement in all cases.</p> <p>Proposed change</p> <p>After the first sentence of paragraph 4.1, insert an additional sentence:</p> <p>“However, this process is not mandatory and will depend upon the developer’s co-operation and willingness to take part.”</p> <p>Alternatively (our preferred option), the Council should amend its policy such that a forum is mandatory for proposals that are “sensitive to the wider community”.</p> <p>4.4 Pre-Application Community Engagement (PACE) Concern: Inadequate notification</p> <p>Paragraph 4.1.1 states that a Forum will: “□ Inform Members and the public of a development proposal at an early stage in the pre-application process”, and refers readers to the Pre-Application Community Engagement Guidance Note for further details.</p> <p>In answer to the question “How will I know about a Forum?” the Guidance Note reads:</p> <p>“Invitation letters will be sent to neighbours who</p>	

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		4.4	<p>would normally be consulted on a planning application advising them of the event at least 5 working days before the Forum, and additional information will be placed on the council website.”</p> <p>10-This is inadequate for three reasons: 1. Neighbour notification is insufficient for major developments (like those proposed for Heamoor), whose impact extends beyond residents who are immediately adjacent to the site and affects the entire village, in terms of (for example) traffic flows and upstream/downstream flood risk. 2. Five working days is too short a notice period. 3. Publicity on the Council website alone discriminates against people without internet access.</p> <p>Proposed change</p> <p>To the extent that the Guidance Note is incorporated in the Statement of Community Involvement by reference, it should be amended to incorporate the following requirements: In the case of a major development proposal that materially affects a community or settlement, all residents of that community or settlement should be notified of the Forum individually in writing.</p> <p>2. Local residents should have 21 days’ notice of a Forum, to give them sufficient time to arrange attendance, study the proposals and prepare questions. 3. Notices of the Forum should be placed in the local press and on designated community noticeboards.</p>	

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		Table 2	<p>4.4 Once a planning application is submitted Concern: Inadequate advertisement Paragraph 4.4 (Press notice bullet point) states that "in accordance with statutory requirements applications are advertised in the local press".</p> <p>To those unfamiliar with the statutory requirements (which would include most members of the public), this gives the misleading impression that all applications are advertised in the local press.</p> <p>This is not the case. Within the Penwith area at least, the Council currently advertises in "The Cornishman" only those applications that it has a statutory duty to advertise: major developments; applications subject to an EIA; applications that do not accord with the development plan; and applications affecting a listed building, a public right of way or a conservation area.</p> <p>No other applications are advertised. Most local residents we have consulted are unaware that the list published in "The Cornishman" is incomplete.</p> <p>This contrasts with the policy applied by the former Penwith District Council, which advertised all planning applications in "The Cornishman".</p> <p>11-Although the current policy satisfies the minimum statutory requirement, it discriminates against people with no internet access because notices of most planning applications can now only be accessed online.</p>	

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			<p>To allow everyone equal opportunity to be informed of applications, the Council should go beyond the statutory minimum and should publish all planning applications in the local press, without exception.</p> <p>This is particularly important for smaller rural communities, where even a development that does not qualify as "major" may have a significant impact on local residents.</p> <p>Proposed change</p> <p>Amend Council policy to require all planning applications to be published in the local press, and amend the third bullet point accordingly:</p> <p><input type="checkbox"/> Press notice – In accordance with statutory requirements All applications are advertised in the local press; If the Council refuses to make this policy change in spite of the prejudicial effect on residents with no internet access, then the above bullet point should be amended to make it clear that not all applications are advertised: "<input type="checkbox"/> Press notice – In accordance with statutory requirements, some types of application, but not all, are advertised in the local press;" 4.4</p> <p>Summary of Consultation Methods Concern: Failure to consult local councils on certain matters Based on table 2, it would appear that consultation with the local council is no longer required for minor</p>	

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			<p>developments or householder developments. This represents a substantive removal of powers from town/parish councils that runs counter to the spirit of localism and community involvement in planning decisions.</p> <p>In many small rural communities even a "minor" development can have a substantial impact on local residents, and their local town or parish council (which has far more in-depth knowledge of local conditions and constraints than Cornwall Council) should retain its status as consultee on such matters.</p> <p>Proposed change Amend table 2 to place tick-marks under "Consultation with local council" for the "Minor Development" and "Householder Development" types of application. 12</p> <p>Summary of Consultation Methods</p> <p>Concern: No neighbourhood notification on certain matters Based on table 2, it would appear that neighbourhood notification is not required for (i) Departure from the Development Plan, (ii) Development affecting a Public Right of Way and (iii) Waste Operations. Each of these has the potential to significantly affect residents of neighbouring properties, who should therefore be individually notified. Omitting neighbours from the process runs counter to the spirit and letter of paragraph 155 of the NPPF.</p>	

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			<p>Proposed change</p> <p>Amend table 2 to place tick-marks under "Neighbour notification" for the "Departure from the Development Plan" "Development affecting a Public Right of Way" and "Waste Operations" types of application.</p>	
22	St Day Parish Council	4.3 table 1	<p>We feel there should be provision for public consultations on developments of less than 9 houses.</p> <p>It appears that St Day is in area 5 for which there is no community infrastructure levy – why is this so?</p>	<p>Comments noted.</p> <p>Table 2 will be amended to ensure that local councils are consulted on minor development and householder applications.</p>
23	St Ives Parish Council	<p>Page 5 2.</p> <p>page 6 Figure 2</p>	<p>Community Involvement in Planning Policy third paragraph suggested amendment to the text:</p> <ul style="list-style-type: none"> • However, the Council is committed to encouraging early and meaningful engagement prior to the necessary formal consultation process. This earlier engagement with the community could deal with some of the negative views which would otherwise come up at the consultation stage. By engaging communities and other interested parties, the Council gains local knowledge and expertise, along with community commitment to the future development of Cornwall. • (Engagement is explained further under paragraph 2.3.1 Engagement on page 8) <p>Key Stages in the Preparation of Development Plan</p>	<p>Comments noted. Terminology will be clarified, where appropriate. Duplication in figure 2 will be removed.</p> <p>Amend the document so that the paragraph on page 8 "The Local Development Scheme...." appears on page 5.</p> <p>Amend "when submitting a document to the Secretary...." to read State.</p> <p>Amend paragraph 3.1 on page 10 to read Community Right to Build <u>Order...</u>"</p> <p>Make amendments to Figure 5 as</p>

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		<p>page 8</p> <p>Page 9</p> <p>Page 10</p> <p>Page 12</p> <p>Page 17</p>	<p>Documents Correction:</p> <ul style="list-style-type: none"> under Community Involvement 'Consideration of representations received' is duplicated <p>first paragraph Query:</p> <ul style="list-style-type: none"> 'The Local Development Scheme' does not refer to anything in Figures 2, 3 & 4 on the previous pages 6 & 7. This could follow on directly from '2.2 When we will engage' on page 5 <p>4th bullet point</p> <p>Correction:</p> <ul style="list-style-type: none"> 'When submitting a document to the Secretary of Stage' should be State 3.1 What is Neighbourhood Planning? In the first paragraph there is a reference to 'Community Right to Build' but this is not followed up with any further explanation of this process. <p>continued/ page 10 (continued)</p> <p>Suggested amendments to the text:</p> <ul style="list-style-type: none"> 'Local communities would, by creating a Neighbourhood Development Order, also be able to give full or outline planning permission in areas where they most want to see new homes and businesses. Neighbourhood planning also requires 	<p>suggested.</p> <p>Table 2 will be amended to ensure that local councils are consulted on minor development and householder applications.</p>

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		Page 18 and 19	<p>support from Cornwall Council. continuation of Figure 5</p> <p>Correction:</p> <ul style="list-style-type: none"> • Publication of the examiner's report ' The Council will: • Publish on our website a copy of the examiner's report ' Table 2 Summary of Consultation Methods <p>Query:</p> <ul style="list-style-type: none"> • Why is 'consultation with local council' not ticked (i.e. not required) for Minor Development (1 - 9 homes etc.) and also Householder developments? <p>Over-sized font:</p> <ul style="list-style-type: none"> • For the website given at the end of 4.5 Determining a planning application and similarly under Appendix 1 'local bodies 'a relevant authority 	
24	St Newlyn East Parish Council		St. Newlyn East Parish Council welcomes any opportunity to be involved in the Planning Process.	Comments noted.
25	Member of the public – Stephen Cornish		I'd love to feedback on this consultation BUT what exactly can we comment on in which you will actually listen? Are you looking for comments that will suggest radical transformations to the document or comments that follow your policy but make suggested amendments? I'm really confused as to what you are asking exactly from us the public here?	Comments noted. The consultation sought views on the content of the Statement of Community Involvement for Planning.
26	South West Water		Thanks, content noted.	Comments noted.

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			<p>householder developments upwards, will appear in the weekly listings, and that this policy will be fully complied with.</p> <p>(n.b On no account should website listings ever become the sole source of information, as this would completely disadvantage those who, for a number of reasons do not own/ use digital technology.</p> <p>We fail to understand why site notices for householder developments should only be discretionary (4.4) even if such developments are advertised in the local press, not everyone purchases a local paper, and for them a site notice is the sole source of information. Some so called "householder developments" can have a major impact on a sensitive area (eg AONB) and be a cause of concern for the wider community, and not just immediate neighbours. We believe that site notices should be mandatory in all cases.</p>	
28	Luxulyan Parish Council (received 05.02.18)		<p>Luxulyan Parish Council supports the document Community Involvement for Planning, especially on two points.</p> <p>1) Luxulyan PC strongly supports efforts to use PACE (Pre-application Community Engagement) regularly. As the procedures for PACE are used regularly and thoughtfully PACE will mature into a highly effective community development tool.</p> <p>2) The wealth of local knowledge and community commitment that town and parish councillors bring</p>	Comments noted.

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			<p>to planning issues are often undermined by a lack of procedural knowledge.</p> <p>Cornwall Council would do well to support the training of local council members so that they can effectively influence and support development in Cornwall.</p>	