

# **Issues with WHBC's Statement of Community Involvement (SCI) and the Local Plan.**

## **1. Overview**

All local planning policies and decisions on planning applications must take account of what the National Planning Policy Framework (NPPF) says about different types of land use. It is the main statement of Government policy on how development should happen in England.

The NPPF includes the following text on page 17, section 8:

*“The planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. Local planning authorities should create a shared vision with communities of the residential environment and facilities they wish to see. To support this, local planning authorities should aim to involve all sections of the community in the development of Local Plans and in planning decisions, and should facilitate neighbourhood planning.”*

On page 37, section 155 it states:

*“Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be pro-actively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”*

(Link to NPPF text here:

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/6077/2116950.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf))

The above text can be seen as the underpinning principles behind the WHBC Statement of Community Involvement, an important document that provides the terms of reference as to how WHBC will involve the community in its Local Plan development.

Government planning guidance (Ref Paragraph: 017 Reference ID: 12-017-20140306) mandates that an SCI must be produced, see the quoted text below:

*“[Section 18 of the Planning and Compulsory Purchase Act 2004](#) requires local planning authorities to produce a Statement of Community Involvement, which should explain how*

*they will engage local communities and other interested parties in producing their Local Plan and determining planning applications.”*

The Draft Local Plan Proposed Submission currently in consultation directly references the WHBC Statement of Community Involvement (SCI) policy. Page 8, section 1.5 states:

*“The Local Plan has been prepared following consultation with the local community in accordance with the Council's Statement of Community Involvement which sets out when the Council will consult the community in relation to the Local Plan, how the Council will engage with the community and who the Council will involve in that consultation”.*

Regarding Welwyn Garden City in particular in April 2014 the DCLG released a paper called “*Locally Led Garden Cities*”, section 8 states “*In essence, we think Garden Cities are liveable, viable, modern communities with the resident at the centre of planning*”. The WHBC SCI community engagement activities thus far, or lack thereof, are proof that the residents of WGC are most definitely not at the centre of planning.

Ref:

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/549617/Locally-led\\_Garden\\_Cities\\_prospectus\\_archived.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/549617/Locally-led_Garden_Cities_prospectus_archived.pdf)

This paper sets out to show that the important texts above have not been adhered to, both within the Statement of Community Involvement (SCI) document, and in the Local Plan consultation process which has been under way since 2009.

## 2.Recent history of the SCI

The current revision of the SCI was adopted following public consultation which ran from November 2012 to January 2013. It was adopted on 3<sup>rd</sup> December 2013.

There were only 25 responses to that consultation which begs the question of how well publicised it was and consequently seriously undermines its credibility. However, the resulting and adopted SCI, now forming part of the Local Plan consultation evidence base, does not even reflect many of those 25 responses.

All the comments into this consultation can be found online here:

[http://consult.welhat.gov.uk/portal/planning\\_policy/local\\_plan\\_consultation\\_november\\_2012/sci2012?page=0&pageSize=100&status=&tab=list&sortMode=response\\_date&q%3AsortMode=](http://consult.welhat.gov.uk/portal/planning_policy/local_plan_consultation_november_2012/sci2012?page=0&pageSize=100&status=&tab=list&sortMode=response_date&q%3AsortMode=)

Reading these comments it becomes clear that many valid points were raised, but then not addressed in the current version. It is very concerning that the SCI policy now being used to underpin community involvement is relying on a flawed process document.

### 3. Quotes from the current Statement of Community Involvement

#### **The SCI states at point 3.21:**

*“The council has to balance the extent of community engagement with the available staffing and financial resources. Staff within the planning policy team will primarily be responsible for carrying out the consultation processes for the Local Plan.”*

#### **And at 3.23:**

*“Resources will be targeted to where they will be used most effectively. Workshops and focus groups are resource intensive and will therefore be used where a more considered response is required or where there is an opportunity to consider a topic in more depth to encourage greater participation from particular sections of the community.”*

#### **Comment:**

The new Local Plan once adopted will be the blueprint for development in Welwyn Hatfield until 2032. WHBC should ensure that adequate staffing and resources **are** available to ensure full community involvement in the process of plan making.

With regards to the consultations that have taken place since 2009, leading up to the current and final consultation it would appear that WHBC has chosen not to invoke workshops and focus groups in any significant way, as set out in the SCI at 3.23. Yes, they are resource intensive, not only for paid staff but also for residents who are not paid at all, but feel strongly enough about the proposed developments in their community that they want to devote time and effort into participating, for free. Due to a sense of civic pride and desire to secure the best future for where they live. Workshops and focus groups may require half a dozen staff, but could also involve hundreds of residents, giving up their equally valuable time to have their voice genuinely heard.

With regard to the Local Plan process since 2009 there has been very little community involvement. Focus groups and workshops organised by WHBC have not been a feature, although one or two cursory attempts have been made over the seven years. These narrowly focussed workshops once undertaken do not seem to have fed into the Local Plan submission document. Especially the most recent one in 2015, for which no findings or outcomes document has ever been published. The couple of dozen residents who were able to attend these small events, held during the day when working people could not attend, must be wondering why they bothered giving up their time?

**Page 4 of the WHBC SCI contains a table that states:**

*“How we will consult:*

*We will use a range of types of consultation during this stage in order to understand key issues and views. Methods will include one or more of the following:*

- *How will we consult Surveys and questionnaires.*
- *Correspondence through letters or email.*
- *Workshops or focus groups.*
- *Drop-in events, displays or exhibitions.*
- *Meetings (one to one or group).*
- *Make plans available on our website and at public inspection points (council offices and local libraries).*
- *Targeted measures for hard to reach groups”*

It is important to note that there appears to have been no surveys or questionnaires about how WHBC will consult since the beginning of this process in 2009, and certainly not at this important final stage.

If there have been, then where is the evidence?

It is also important to note that while WHBC have sent out letters or emails to previous consultation responders notifying them of the consultation now under way, about 1,600 people, it is still the case that not a single letter or leaflet addressed to all householders in the borough has been posted out to raise awareness of any of the four the consultations since 2009. This has been requested over the years of the plan making process, including for this consultation, but has not been done. Only the people who have already commented on a previous consultation are written to or emailed. Those who have not engaged before are not notified at all. This especially disadvantages 'hard to reach groups' who WHBC acknowledge exist, yet do not make any serious effort to engage with. One thousand six hundred people in a borough of 116,000+ does not fit with the NPPF statement that *“A wide section of the community should be proactively engaged”* at all.

#### 4. Hard to reach groups

The WHBC SCI does not even try to define what constitutes a hard to reach group. Page 16 of the SCI merely states “Targeted measures for hard to reach groups.” without giving any explanation at all about who these groups typically are, and how they will reach them.

In contrast, other Local Authority SCI's do cover this in the required detail. For example, Brentwood Local Planning Authority's SCI includes the following on pages 12 & 13:

*“Whilst the Council wishes to engage with the community as a whole, there are so called ‘hard to reach’ groups that fail to get involved in the planning system. Some, but not all, ‘hard to reach’ groups are:*

*Young People, in particular those aged 21-25 years old*

*Black and other ethnic minority groups*

*People with disabilities*

*The elderly*

*Rural communities*

*People with learning difficulties*

*Gypsies and Travellers*

*Other:*

*representative groups and organisations will also be directly consulted and invited to stakeholder meetings to enable engagement with hard to reach groups, such as ethnic minorities, the elderly, the young and disabled persons.*

*4.9 Children and young people will be encouraged to be involved by working with schools and colleges, the Brentwood Youth Council, the Youth Parliament and other appropriate agencies. The older residents of the Borough and people with disabilities will be involved through groups such as the voluntary services, Help the Aged, Age Concern, Access Group, Essex Disabled Peoples Association etc. Ethnic minority groups, including Gypsies and Travellers, will also be engaged through representative groups such as the Commission for Racial Equality, the Essex Racial Equality Council, the Gypsy Council and the Gypsy and Traveller Law Reform Group.”*

The above highlights the clear deficiencies in the WHBC SCI. This is a key document that guides the development of a Local Plan and it follows that if it is not fit for purpose then the Local Plan is unsound. If this Essex council, and many more others, can produce a document

of sufficient quality and detail then surely WHBC is deficient in not producing one for the benefit of its residents.

Welwyn Hatfield does have a diverse population, and there are areas of multiple deprivation, as noted by WHBC in their plan documentation. There are various forums that are held in the borough to cater for those with disabilities and many non-governmental organisations and charities who also host service-user groups, such as Age UK, Mind, and Carers in Herts. There is even a local charity whose sole aim is to promote service-user involvement in issues that may affect them. All of these, and many more, work exclusively with hard to reach groups. Many people who may be seen to be "hard to reach" by their very nature are not IT literate and not online. As per the Equality Act 2010 anybody with a disability is entitled to the same level of provision and engagement as anybody else in the community.

The Herts Directory has a long list of local groups who could have been approached:

<https://directory.hertfordshire.gov.uk/kb5/hertfordshire/directory/home.page>

Have WHBC liaised with the various social services teams that regularly meet individuals from hard to reach groups, in order to provide information and canvass views on the Local Plan, if not why not?

Welwyn Hatfield has a strong voluntary sector, if the issue was staff and resources then it should be possible to access volunteers who would help them in the task of disseminating information about the Local Plan and requesting consultation feedback. Why has this not been done?

The latest Annual Monitoring Report looks at the effectiveness of the last consultation in 2015 and declares *"the under-representation of respondents aged 25-34 is a concern and this clearly remains a 'hard to reach' group."* <http://www.welhat.gov.uk/CHttpHandler.ashx?id=10824&p=0>

You might think this is a very odd definition of a hard to reach group, an age range of people usually most active and in the prime of their lives. Organisations whose aim is to engage hard to reach groups would not agree with this age range as having the blanket definition of being hard to reach. Have WHBC ever researched what a hard to reach group typically is? There is no evidence of this in their plan documents. The diverse range of groups mentioned previously (from Brentwood) are usually what defines a hard to reach group, not a blanket age range of people who would most often be active fit and healthy. It seems that WHBC define this age range as a hard to reach group because their communication strategy has failed to reach or inspire this age group to comment. Perhaps if these people had a letter through their letterbox more of them may have responded.

## 5. Local Awareness of consultations and drop-in events

WHBC have published half or whole page advert style notifications about consultations in their in-house quarterly magazine called "Life" delivered to households but the information provided lacked any substance. They did not mention any actual locations in the borough for example, people would not have known that this might affect where they live.

Most importantly, many residents say they do not read this magazine and it goes straight to recycling as it really is just a publicity vehicle for WHBC and has little of general interest.

It is fair to say that WHBC has not sought to involve all members of the community through letters and correspondence. With over 116,000 residents in the borough the level of public awareness raising has been very poor. The most recent Annual Monitoring report (2016) states on page 2:

*"The major engagement exercise on the Local Plan Consultation Document yielded nearly **5,900** responses from around **1,600** respondents – this is a significant number".*

Rather than a significant number, a mere 1,600 actually demonstrates an abject failure to raise awareness of a consultation. Only 1.4% of the boroughs population gave any input at all as to how they want to see the borough develop over the next 16 years. WGC is the world's second Garden City and often regarded as the most successful town of the genre. On heritage and ethos grounds alone you would expect WHBC to be aiming for a much higher engagement figure than this. People come to this town because of what it is, WHBC have a duty to preserve its uniqueness. Low and poor quality community involvement dilutes the town and does a huge disservice to its residents, current and future. It is also not in keeping with the requirement of the NPPF statement that *"A wide section of the community should be proactively engaged"*. It cannot possibly be claimed that 1.4% represents a wide section of the community. Especially as for much of that 1.4% they were not able to collect any diversity data to ascertain whether they respondents may be from a hard to reach group.

## 6. Consultation Experiences

Many residents have commented in previous consultations that the online consultation portal is very complex and difficult to use, even for those with good IT skills. Local resident groups have had to put on community meetings themselves, to demonstrate how to use the portal and submit comments over the years since 2009. This is because the council have offered no support at all in this regard, despite the SCI stating that they will hold workshops and focus groups. Comments submitted asking for a simpler process or more help to navigate the portal have not been addressed. The 2016 online consultation is no simpler, and has no more help available than in the previous consultations.

Things have gone from bad to worse in some ways. The current consultation portal presents five documents for consultation. Only two of these allow for comments to be made online within the documents, as is the function and purpose of the consultation platform software. The other three have to be downloaded separately, read, then commented on using another form from the online portal that only allows one comment at a time. This is very cumbersome and renders the process inaccessible to many would be commenters.

The Draft Sustainability Appraisal is 184 pages, the Draft Local Plan Proposed Submission Habitats Regulations Assessment Report is 104 pages. Printed copies of these documents are not freely available from WHBC and reference hard copies can only be viewed at limited locations within the borough. This does not equate to accessible public participation, and especially not for 'hard to reach' groups, who although undefined as a group by WHBC, are likely to find it even harder to engage with this consultation. All the more reason why WHBC should do more outreach work to enable hard to reach groups to participate, as per the SCI, but they have not done this.

It is worth noting that data from the last consultation in 2015 shows that only 1.7% of all respondents made comments about the Sustainability Proposal and 5.1% responded to the Draft Infrastructure Plan. Again, this was probably because the process of commenting was so difficult, rather than residents had no comments to make, even if they were aware of the consultation happening at all.

Printed copies are charged for, at £15 or £30 each. There is not enough information in the free summary document alone to make an informed and detailed submission to the consultation, making this document almost worthless.

### **Consultation Events**

Drop-in events have taken place, but these are effectively after the horse has bolted. They are always events where WHBC presents posters and information about its current proposal and consultation. They are not collaborative plan making events, they are simply promoting the plan that WHBC has already developed without any meaningful community participation, as required by the SCI and the NPPF. Some of these events have been very poorly advertised, located and attended. One of the events during the last consultation was held at Sir Frederic Osborne School, WGC.

A large and sprawling school, in a room at the rear of the site. There were no directions from the school gate, and nobody on hand to direct visitors. There was no sign on the door of the room, assuming you managed to find it after wandering, in the dark, through a maze of secondary school buildings. It was almost as if they did not want you to find it. Indeed, some people commented online afterwards that they had given up trying to find it and gone home.

Meetings, one to one and group, have been sparse. While it has been possible to have meetings with the planning department to raise questions about their plans, they have not undertaken any group meetings within local communities as the plan has been in development. It has been suggested on several occasions that a town hall type meeting be organised to allow residents a constructive dialogue with the planning department but this has been turned down. Indeed, on one occasion, the Head of Planning himself responded that it would not happen as it would not be fair to subject planning staff to disgruntled residents! Perhaps if they did deign to engage with residents they might not be so disgruntled. Again this is at odds with the intentions of the SCI re focus groups and workshops.

This time around there have been no “drop-in” events anywhere other than the six locations across the borough for the general public. All of these are on weekdays and all start at 3:30pm. The same applies to the events organised for the previous consultation since 2009.

There has only been one event in Welwyn Garden City during 8 weeks of consultation, even though it is proposed that WGC will receive by far the largest proportion of housing over the period (4,923 homes). This one event was itself poorly attended as it turned out, with well under 100 people attending. The event was not advertised locally at nearby shops or community centres, many people appear to have been unaware it was happening. This is very poor community involvement, as a result of a poorly written SCI, and not in keeping with the quoted texts above from the NPPF. This is a failure to engage with the local community.

## 7. Gypsy and Traveller provision

Traveller pitches are also a feature of the Local Plan. Where is there any evidence within this consultation that WHBC has actually managed to engage with the traveller community to ask for their views when developing this plan? It is possible to find a recent document with the very vague link title of '*Download the assessment report*', that can be found here: <http://www.welhat.gov.uk/GTTANA> .

The document itself is titled “Welwyn Hatfield - Gypsy and Traveller and Travelling Showpeople - Accommodation Needs Assessment 2016”. This is a 2016 document, updating the previous 2012 document. Section 9.11 of the Draft Local Plan Submission now in consultation addresses future pitch provision for Gypsies and Travellers. It provides numbers, but does not reference this evidence this document anywhere as being the supporting evidence. This document also doesn't feature as a discrete document on the consultation portal, alongside the IDP or Habitats Assessment for example, why is this? It can be found through much trawling of the site but you have to look very hard, why is this?

It could also be claimed this plan is unsound because it is not justified, which it must be in order to be sound. How can WHBC claim they have adopted the most appropriate strategy when considered against the reasonable alternatives, based on proportionate evidence?

The Local Plan must be based on a robust and credible evidence base, which includes research and fact finding, and evidence of local community participation, as specified by the Planning Advisory Service. There appears to be no proportionate evidence and no details of any alternatives.

The 2016 GTTANA assessment lists the members of a new steering group set up to facilitate stakeholder involvement, they are:

*“Hertfordshire County Council (HCC) Gypsy and Traveller Section;  
HCC - Access to Education for Travellers and Refugees Integrated Services for Learning;  
Welwyn Hatfield Housing and Planning teams; and The Welwyn Hatfield Community Trust.”*

It is obvious that the key stakeholder in this area would be representative(s) from the communities in question, and yet they are not involved at all, according to this list. Although it is said they were involved in the preparations for the fieldwork, however it appears only 11 of the 57 pitches engaged in the assessment when it took place.

Other Local Authorities have been vastly more successful in obtain the views of their traveller communities, some interviewing dozens of families and forming partnerships with local Universities and Traveller forums in order the facilitate their involvement.

The WHBC Local Plan proposes new locations for traveller pitches beside existing settled communities (housing) and as part of a new development of 650 new homes. Where is there any evidence that:

- a) This is what the traveller community would favour
- b) This is what the existing local community would favour, they have never been contacted by WHBC about it?
- c) Why have these locations been chosen, why are there no alternatives proposed?
- d) All the proposed pitches are in a narrow geographic band across the centre of the borough, where is the justification for this, why are there no proposals for the north or south of the borough?

These questions challenge the soundness of the plan in terms of robust and credible evidence. Is it the most appropriate strategy when considered against the alternatives? There are no alternatives proposed and it apparent that the choices made in the plan are not backed up by facts, this renders it unsound.

**Section 4.4 of the SCI states:**

*“It is important to recognise diversity within the borough and to consider the potential needs of all sections of the community, including those who do not have such a well developed culture of public participation. The council recognises that the planning system can seem complex and confusing and this can prevent some people getting involved”*

This section of the community is clearly a hard to reach group without a well developed culture of public participation and yet the SCI has no strategy for engaging such groups, again this is not sound.

**8. Other sections of the SCI:**

**Section 4.7 of the WHBC SCI states:**

*“To improve participation we will:*

*Produce non-technical and summarised versions of documents Use the most appropriate methods to reach different parts of the community subject to the availability of resources*

*Respond to any reasonable requests to make consultation material more accessible.*

*Identify when local community events and other meetings / markets / fun days take place to enable the council to have a visible presence in the community during consultations.*

*Seek to coordinate community consultation programmes between the council’s departments and others where feasible and effective to remove duplication, combat consultation fatigue and make the most of opportunities to maximise different skills and resources.*

*Find the right time of day to hold events (although it is difficult to always suit everyone) and explore alternative styles of consultations to engage young children and other hard to reach groups, Investigate the use of other locations/ inspection points in addition to the usual locations, for example local shops and school.*

*Liaise with local organisations such as residents’ groups, to disseminate information.”*

Where is the evidence that WHBC has had any visible presence at local events, fun days, market days, community events etc., during recent consultations? It is a fact that because this has almost never happened at least one local residents group has organised its own

stalls at local centres to raise awareness with residents and hand out consultation summary documents on behalf of WHBC, because they have failed to do so. Similarly, several public town-hall style meetings have also been organised and facilitated by a local residents group, precisely because WHBC has refused to put on any themselves, since 2009 when the process began. These limited local efforts only reach a couple of hundred residents at best, and nobody from WHBC was in attendance to field questions.

Many thousands of leaflets have also been produced and delivered to residents by local civic groups, concerned that because WHBC has never written to residents directly, they may not know about the consultation opportunity and what the issues are.

Verbal feedback from residents spoken to a local centre stalls reveals that many of them knew nothing about how to participate in the consultations since 2009. What steps has WHBC taken to ascertain the actual level of public awareness of their consultations, in order to determine what they could do better to engage residents? There is no evidence of this that we know of.

#### **Section 4.9 of the SCI states:**

*“Councillors are also community representatives, so people can get information from their ward councillors and share their views.”*

It is a fact that throughout this process since 2009, many residents in some parts of the borough have shared their views and asked their councillors to raise issues and vote accordingly when there have been important votes relating to this process. However, the evidence is that councillors from some wards have consistently ignored representations from local people and groups (including hundreds of emails sent to them) and voted instead for motions that local people have implored them to vote against. This renders many local councillors completely ineffective in representing residents on Local Plan matters. The voting record will speak for itself. Section 4.9 of the SCI has not been followed in that some councillors have chosen not to share and represent residents’ views when voting on Local Plan issues, and have consistently voted against the wishes of their constituents, this is a matter of record and can be evidenced. It can even be seen on recordings that WHBC have placed online at residents’ request. These can be seen at the below links, if they are not taken down in light of this document:

From the June 2016 Housing Panel meeting:

<https://www.youtube.com/watch?v=xVIFU5irtQU>

From the December 2014 Housing Panel meeting:

<https://youtu.be/ElkRrB37cag>

It is notable that both the leader of WHBC and the chairman of this panel represent a ward (Brookmans Park and Little Heath) receiving a disproportionately low number of proposed homes and no traveller pitches relative to its size compared to wards in Welwyn Garden City and Hatfield. Brookmans Park and Little Heath represents the largest ward by area. One cabinet member has on several occasions now voted for the proposed large development in Panshanger, while simultaneously pledging to local residents that he will oppose such plans. Hand written evidence of this can be seen below:

I am currently a cabinet member and have confirmed my opposition to the development and the loss of the air field

Best wishes

Roger Triff

It seems clear to residents that councillor representation, in some parts of the borough at least, is non-existent. As such, some councillors are not community representatives as the SCI claims they are supposed to be, rendering this SCI not fit for purpose in this regard.

### **The WHBC Annual Monitoring Report 2014/2015 (published January 2016):**

The Annual Monitoring report is the place where the effectiveness of consultations and consequently the effectiveness of the SCI is monitored.

From section 3.2:

*“The Welwyn Hatfield Statement of Community Involvement (SCI) is the means by which the Council aims to facilitate this – that the borough’s diversity is recognised, and the potential needs of all aspects of the community are considered. The current SCI was adopted in December 2013; and identifies young people, ethnic minorities, the borough’s rural communities and those living in less well-off parts of the borough as under-represented, or “hard-to-reach”. It sets out ways in which the Council will aim to consult in a broader way, for example by holding consultation events in places that people routinely visit (such as the borough’s town centres) and at a variety of times of day, and by making proposals as easy to access and understand as possible.”*

This strategy above seems perverse. How is the council consulting in “a broader way” with hard to reach groups by siting consultation events in town centres? People who may be

isolated, without transport, without mobility, in less well off and more rural parts of the borough are less likely to routinely visit town centres, that is partly why they are 'hard to reach', they don't go where most others go, this is an unsound strategy.

Also from the same Annual Monitoring Report:

*“3.15 What is equally notable is that in some urban wards (such as Hollybush and Howlands) there have been very few respondents, despite relatively significant amounts of development being proposed. Given that the majority of consultation responses tend to be objections, this could simply mean that residents in those wards are supportive of development, or not concerned by it. But it is equally likely to demonstrate continued underrepresentation of residents in the borough’s less well-off wards (and over-representation in well-off areas). Better engagement with residents of the relatively less well-off areas should therefore remain a priority.”*

If under-representation from less well off areas is a priority where is there evidence that WHBC have taken any steps to improve it? No local events in those areas, no leaflets through doors, no local engagement at schools or community centres, nothing at all. The only consultation event in WGC is not in a less well off area, and quite far from Hollybush and Howlands, and in an area on the very edge of town at least a mile from the town centre, and requiring transport to get there, unless you are lucky enough to live close by. There are two Community Centres not very far from the venue but the consultation event was not advertised at either of them.

## 9. Local Plan monitoring

**The Annual Monitoring Report (2013/14) states on page 15 about the previous consultation:**

*“Some comments for future improvement were received though particularly referring to the perceived authenticity of the consultation, the extent to which it was publicised, and there only being one consultation event. These comments will be considered as the Council plans future consultations.”*

Clearly, for 2016 WHBC may have considered this feedback but has not acted on it. The current consultation has not been well publicised and consultation events remain few, not even one per area or ward. This is indicative of WHBC going through the motions but not actually taking any action once residents’ views put to them. This is not community engagement.

Page 2 of the latest AMR states:

*“Community Engagement - The major engagement exercise on the Local Plan Consultation Document yielded nearly 5,900 responses from around 1,600 respondents this is a significant number, and will inform the preparation of the final Draft Local Plan, expected to be published in 2016.”*

**Page 18 of the AMR considers criticisms of the previous consultation and states:**

*“3.18 Nevertheless, the consultation welcomed comments on how the consultation could have been improved – 182 individual suggestions were made. Common themes included: The consultation materials being difficult to understand, either because they were too complex (in language or layout) or not clearly presented;*

*The online consultation portal being too difficult to use, particularly for older people;*

*The overall approach of the consultation not being transparent – some respondents considered that it was purely a ‘tick-box’ exercise and that responding was not worthwhile;*

*The consultation being under-publicised, given the scale of the proposals. Suggestions included all properties surrounding a potential development site being written to, erecting posters around sites, and publicising the consultation through broadcast media.”*

And:

*“3.19 Given the Council’s desire to engage as broadly as possible with the public, the above issues will be considered when planning future consultations. This is particularly the case where the issues identified might be further preventing hard-to-reach groups from responding to consultations on issues that will affect them.”*

Despite another promise to consider the issues raised none of this has been addressed when planning for the current consultation. All of the above criticisms apply in exactly the same way they did in the previous consultation. This represents clear evidence that WHBC does not engage with, and listen to feedback from residents. There is a serious question mark over plan soundness in terms of participation with the local community. Participation means listening to what people say, such that criticisms of the plan making process are resolvable, but WHBC appears to have taken no steps to do this at all. This renders this current plan unsound under the Justified criteria. WHBC have not promoted community participation as they have not acted on feedback given to them in order to make the process easier to engage with. Residents still find it too difficult to participate.

The following was posted on the WHBC website at the start of the current consultation:

*“30/08/2016 Final chance to comment on borough's blueprint for growth*

***Everyone has a final opportunity to comment on the borough's Draft Local Plan during eight weeks of public consultation starting today (Tuesday, 30 August).”***

The reality is that if residents are not online, or are not able to read the article about it in the local paper, they probably will not know about it, and so will not comment.

## 10. Summary

In summary, this document shows that WHBC Community Involvement strategy has not been effective, and in many instances the strategy has not been adhered to. Far too many barriers stand in the way of WHBC residents finding out about consultations, and then having the opportunity to participate in them. The extremely poor response rate to the last consultation of 1.4% of the population proves this.

One of the key requirements of the soundness of plan preparation is that it is justified, meaning that it should be based on a robust and credible evidence base involving evidence of participation of the local community and others having a stake in the area. Given all of the above it is demonstrated that the council has failed to provide any evidence of meaningful engagement, at an acceptable scale, with residents up to this point.

Additionally, residents are told that the current proposed plan submission document can only be commented on in terms of soundness and legality; including whether it is in accordance with their SCI. However, the proposed plan and supporting documents have scant information about what this actually means, leaving residents on the one hand confused, and WHBC on the other hand no doubt able to discount many of the comments that will be made on the grounds that they don't meet the criteria of soundness and legal compliance.

It seems that this final consultation before plan submission for inspection is designed to set residents up to fail. The barrier to informed participation is far too high and WHBC has done virtually nothing to educate and inform residents on how best to respond to this consultation, especially now that the goalposts have been moved and significantly narrowed. This is clearly not community involvement in any meaningful way. The WHBC Local Plan submission appears to fail any test of community involvement on all the grounds stated above. Therefore, the framework set out in the NPPF is not complied with.

For these reasons the proposed Local Plan plan submission is seen as failing the soundness and compliance tests.