

Comments

Local Plan Consultation Document January 2015 (23/01/15 to 19/03/15)

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Comment ID	lpc487
Response Date	10/03/15 08:57
Consultation Point	1 Introduction (View)
Status	Submitted
Submission Type	Web
Version	0.1

Files

Do you support the approach taken? (please select one) . No, object

Please state your reasons for supporting or objecting:

This submission is from the Panshanger People local civic group. We are a constituted group with an active committee who have been following the development of this local plan closely for the last two years. We have well over 1,000 members on our supporter list.

We submit the below comment to highlight issues to do with the process of this consultation thus far which we think deserve attention. It is our belief more effort should have been made to include our local residents in this consultation.

Regarding the last consultation and the Emerging Core Strategy responses from 2012/2013 :

As part of the last consultation (Emerging Core Strategy) the council consulted on its Statement of Community Involvement (SCI). Comments were received and the resulting document was adopted on Dec 3rd 2013. Some of the comments made when the SCI went out to consultation are still relevant to this new version. This SCI version was intended to guide the plan-making process in terms of public participation but is not referenced in this 2015 consultation, and many of the policies laid out within the SCI 2013 do not appear to have been used or referenced with regard to this current consultation. The SCI is very much focussed on plan-making so should have been quoted/referenced here in our view.

Specific points to address:

The SCI states in section 3.1: *"There are many individuals, groups and organisations in Welwyn Hatfield who will be given the opportunity to be involved in the preparation of planning documents and to comment on relevant planning applications."*

The Local Plan consultation document offers no information as to how groups across the borough have been pro-actively contacted and offered a chance to become involved in this consultation. Our experience is that many local groups knew little or nothing about it and were not contacted by the

council. Giving a group an opportunity must surely include making them aware of the opportunity in the first place.

Section 2.2 of the SCI states : *"the council has developed an electronic database of consultees to involve at various stages of the plan making process. This list is not fixed and those who wish to be consulted can be added to it."*

As has been said in the previous consultation, too much reliance has been placed on the electronic database as a means of engaging with the wider community. The database of consultees simply draws upon an already limited pool of pre-engaged (from previous consultations) respondents whose demographic is probably of a more uniform nature than that which actually exists in the local community. How can such a small sample define our community? The use of the online consultation portal requires people to have an email address at the very least, resulting in those not online or with little or no ICT knowledge being effectively excluded.

While it is true that many people do now use electronic means of communication there is no actual evidence in the consultation, in any case, that a genuine effort has been made to grow this database to the point where it may have some hope of becoming a representative sample. To our knowledge this hasn't happened as so far we can only see 3,600 online respondents which in a borough of 110,500 (2011 census) people represents a mere 3% of the population.

Also, have all the consultee bodies stated in 3.4, 3.5., 3.6 and 3.7 of the SCI been contacted to inform them that the consultation is happening and that they can register as a consultee? This is not evident at all.

Section 3.8 of the SCI states: *"Equally, It is very important that the wider community- people who live, work, run businesses and study in the borough – are consulted. Members of the public who would like to be notified about planning consultations and the progress of documents can add their details to the consultees electronic database."*

The 2015 consultation, like its predecessors in 2009 and 2012, has not involved an active dissemination of information in order to make the residents aware of what is being planned, of major impact, in their local community. There has been no specific and comprehensive explanation delivered to residents' addresses beyond the regular quarterly/half yearly WH Life magazine containing a perfunctory nod to the innocuous sounding "Local Plan". A casual glance as a Panshanger resident at the single A4 page Planning News of the Spring edition tucked away on page 7 might not even register the magnitude of the proposed development in their area. It is only with the application of a magnifying glass that anyone might realise that that black dot (without key) on the tiny map of the borough to the north east is actually something that might affect oneself. Panshanger, indeed none of the sites, are specifically mentioned by area. Is it any wonder that most residents appear ignorant of the council's plan. Again, how and where is the electronic database promoted? And how can those without electronic means find out about the consultation and express their view in a way in which they can easily engage?

Only one local event has been held in the Panshanger ward; it was not well advertised by the council and the turnout was low. The event itself was not signposted properly and those who went along struggled to actually find it. This does not reflect the expression stated above that public engagement is important to the council. If it were important, they would have written to residents and would have had posters/banners outside the school prior to the event, and would have had people on hand to guide people to it (especially at was very dark at the time). Our anecdotal evidence suggests most of those who attended only did so as a result of the information received via the door-to-door leafleting and emailing of Panshanger People.

The council's in house magazine which arrived on doorsteps 2 weeks before the end of the consultation has a paltry one page of A4 about this consultation (WH Life Spring edition). It makes no mention at all of the housing target for the borough, the council planned events to raise awareness of the consultation or provide any details of the proposed locations beyond a tiny 5 ½" by 3 ½" map of the entire borough showing various unexplained black dots. Why have they not taken the opportunity to publicise and expand upon these plans and events in their own magazine over the last two editions (Autumn Winter 2014 & Spring 2015)? It would have been useful to spell out that this consultation is chiefly about where 12,500 new ultimately go in the borough, what the council's current preference is, and why.

Section 3.10 of the SCI states : *"To inform this strategy a toolkit of best practice for working with community groups is being prepared which will be a useful reference for planning teams before the strategy is complete."*

The strategy is complete, the result was this draft local plan, this toolkit has never been referenced or mentioned, our local group would welcome such a thing but it has played no part in this consultation as far as we can see.

Section 3.23 of the SCI states: *"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."*

There have been no workshops or focus groups for residents in the formation of this draft consultation. This group did request such but was told that none would be taking place due to the unpopularity of the council's stance with residents. No public 'town hall' style meetings have been held by the council regarding their draft plan. The closest residents have come to some form of local engagement was asking a few questions at the start of some council committee meetings. These questions were not clearly answered and no right of reply or follow up question was allowed. The questions made no difference at all to the committee voting pattern at these meetings, things seemed to have been decided in advance by the majority of councillors. Evidence of this can be clearly seen in this Youtube video shot by the council themselves: <http://youtu.be/lgsaFa4x7qo>

This local plan is hugely important and needs to be considered in depth by residents as is expressed as desirable in 3.23 quoted above, but this has not and will not happen. Public participation is focussed solely on those who are online and are capable of navigating this complex website. At our own public meeting held to help residents understand and comment on this consultation about 40% of the 100+ present said they would not be commenting online because they just could not or did not understand how to use it. This online focus does not reach out all to large sections of the community, in fact it can be a barrier to participation. As the council have not written at all to residents our group's experience talking to shoppers at local shops is that many people living locally either have no idea this is going on, or if they have heard of it have no idea what the summary headline details even are. This does not seem to constitute meaningful community involvement. These points were made during the last consultation in 2012/13 but this time around nothing has changed at all in terms of reaching out to local residents, despite the new SCI now being adopted.

As part of this group's attempts to inform local residents and facilitate them accessing and participating in this website consultation we have produced our own guide document explaining how to do it because the council have not fulfilled this function at all. We are aware that even council planning staff have been pointing struggling residents in the direction of the Panshanger People guidance on consultation portal use. Our how-to document has been a popular download on the Panshanger People website and has received local appreciation. It is of course no help for those who simply cannot respond online at all.

The Plan Making consultation table in the SCI states : *"We will consult with the wider community at least once during this stage in the production of the document."*

There is no evidence that the hundreds, if not thousands, of objections from residents in the last consultation regarding the proposals for WGC4 made any difference whatsoever. The plan being presented here for WGC is virtually identical to the last one. How does it motivate anyone to take part in a consultation if the current evidence suggests that any objection they make will be ignored?

This group has spoken to many residents about this plan and many believe it is all a done deal and whatever they say will yet again be ignored. How does this sit with the spirit and intention of locally led development as promoted in the Localism Act 2011 and the NPPF?

The table shown in the SCI also states the below, see comments in bold:

"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

- 1 *Surveys and questionnaires . - **We are not aware of any of these taking place***
- 2 *Correspondence through letters or email . - **No letters have been sent to residents informing them the consultation is taking place.***

- 3 *Workshops or focus groups* . - **Neither of these have taken place.**
- 4 *Drop-in events, displays or exhibitions*. - **A short series of events took place. Our local one was not well publicised by the council and then poorly attended. Many residents actually struggled to find it tucked away in the dark at the back of a local school. We believe many of those who attended only did so as a result of the door-to-door leafleting and email carried out by Panshanger People alerting them to this roadshow.**
- 5 *Meetings (one to one or group)* . – **Panshanger People group has instigated a few group meetings itself.**
- 6 *Make plans available on our website and at public inspection points (council offices and local libraries)*.
- 7 *Targeted measures for hard to reach groups* - **We are not aware of any targeted measures, such as visits to community group settings such as day centres, visits to local shops in Panshanger, town hall or community centre public forums. Consultation documents have not been made easily accessible to those in Panshanger who are not online. Paper forms for responding have not been distributed by the council in our local area. Our local voluntary group has sought to do so but is limited in time, capacity and resources. ”**

If local objections are again pushed aside and the WGC4 site goes forward for development the SCI states that the above methods will also be deployed in the next stage, the development of an Supplementary Planning Document (masterplan). How can we have any confidence that any of these methods will be then implemented as so little has been implemented so far, as highlighted above?

Section 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."*

It is unclear what the council have done to consider the needs of those in our local area unable to access or understand the online consultation. Participation in the last consultation was very low in our area until we took action ourselves to inform people, it will be the same this time around. Older people and young adults do not seem to have been targeted as hard to reach groups as far as we can see. Even the email database run by the council is not well publicised. For those not online it is unclear how they are supposed to find out about this consultation, unless they come into contact with our local group.

Section 4.5 states: *"The council's monitoring tells us that young people faith groups and sections of the community living in more deprived areas of the borough tend to be underrepresented or 'harder to reach' during consultation. To a lesser degree, women are often under-represented."*

We also acknowledge this but what action has been taken to improve engagement in this consultation? None that we are aware of, having all this documented in the SCI is meaningless unless it's actually followed through.

Section 4.8 of the SCI States:

"Councillors have a key role to play in plan-making. They are involved in decision-making as plans and strategies are agreed by the relevant planning committee and approved by the council's Cabinet. In addition, the full council must approve Local Plan documents before they are submitted for examination or adoption."

Our local councillors have played no apparent role in seeking to get the council's Cabinet to act in a way that represents what local people want. Our most influential councillor is also executive member for housing. Despite many hundreds of letters and emails from residents, and despite many pleas from our local group to actually represent the view of most residents on the development of our area he has singularly failed to do so. In December he twice voted to make WGC4 a more favourable site for development, despite much local opposition before and during those meetings. He states that he has to wear two hats while working both as executive member for housing and our local councillor, but he chose to accept the former role last year, while already serving as a councillor representing Panshanger ward. He knew then that this conflict of interest would turn out to be a major issue. Despite an earlier written pledge that he would oppose development on the airfield he has shown no opposition at all, and has actually voted for it to become a more favourable site instead. Local residents have told us how displeased they are at his lack of support and representation, despite earlier promises. The key role that this councillor has had in plan making is to facilitate the inclusion of the WGC4 site, in our

view this is in direct opposition to the will of the majority of those he was elected to represent. Is it any wonder there is deep scepticism about the state of our local democracy.

This group makes all these points to highlight how residents of our area have not been served well by this process so far, despite the new SCI document spelling out what is supposed to happen. We hope that all these points will be considered both by the council's planning team and ultimately by the Planning Inspector.

Does a change need to be made? (please select one) . Yes

If you are suggesting a change, please state what it is:

WHBC should implement all the policy and guidance laid out in the Statement of Community Involvement, that document should be referenced in this consultation. Local residents should have at least one direct communication about this consultation. Local councillors should represent their constituents fully and be their voice at the local government level, and not ignore their repeated pleas. They should not be permitted to wear two hats if it impedes their ability to represent their constituents on this matter.

Adopted Statement of Community Involvement (3 December 2013)

We welcome your comments on our consultation - would you like to complete our short feedback form? (If submitting more than one comment, please complete the feedback form once only.) No

How did you hear about this consultation?