

Dear Sir/Madam

5 December 2019

DRAFT STATEMENT OF COMMUNITY INVOLVEMENT: CONSULTATION RESPONSE

The present process for 'public consultation' in planning has been built up over the fifty years since the 1969 Skeffington report on People and Planning. The Council is now asking for views on how public involvement in the planning process could be taken forward and improved. The Society welcomes this and considers that there is now an opportunity to modernise and develop the reference to **public involvement** that the Council rightly refers to in its draft.

In future, the public we feel should be treated as an integral part of the planning process rather than, as now, 'consulted and informed' about projects that have been largely decided between developers and Councils behind closed doors.

Our comments relate primarily to the Development Control (Management) process, but the underlying concepts should also apply to plan-making. So what changes should we consider?

1. Old style '**public consultation**' needs to change to **public involvement** (10.4), and the Council's use of this term is welcomed. Consultation implies that a scheme design has already been decided on, where involvement implies an earlier and more creative role for the public.

2. However, the present system still fails to reflect the open-ness and involvement that the public, and indeed the Government (and the Council see 8.7 & 8.9?) now seeks. Too often, the relationship between Councils/developers and the public has been described as paternalistic, and top-down.

The public now needs to be seen by the Council and the developer as a contributing partner in the creation and evolution of projects.

A fundamental change would see the public being made aware (on day one), that a scheme is being prepared for a site. It would then be able to contribute (see Section 10) to the creation of new development from the start.

The "fait accompli" approach, where a developer presents of a set of finished drawings to the public at a late stage in the project, and asks whether they 'like them', is an outdated model.

Early public and creative involvement should be the norm, and seen as a resource, not an obstacle.

3. The Government (HMG) and Civic Voice and others are now encouraging this early creative approach. The Public intimately knows its town, with its history and character and people, and far better than any developer. This is valuable material that can help outsiders, helping to create designs that work locally, with pre-application advice (8.6).

Developers deal with sites: they have no need to know about the planning of towns, it is not in their skill set.

Once they have built and sold the new building to a pension fund, they disappear. The public, by contrast, lives with the result. Who has the greatest stake in the future of the town? And whose town is it anyway? So what specific changes should be considered?

4. All pre-application meeting minutes and correspondence between developers and the Council officers should therefore be made public on a dedicated Council website on day one.
If developers do not agree to this open and collaborative approach (usually quoting supposed 'confidentiality'), then the Council should not facilitate pre-application meetings (8.5).

5. So-called viability statements should be made publicly available at the application stage to allow proper public examination. Currently there is no public confidence that these secret statements are other than excuses to avoid planning policy requirements. And concealing such 'material planning considerations' from public scrutiny cannot be right. Separately, the Council should press HMG to forthwith exclude so-called 'viability' from the planning system. Such calculations have their value but should stay inside developers' offices.

6. Councils should provide some independent technical support direct to the public, who currently have little access to the professional skills that developers can afford. This would allow the public voice to be properly heard.
7. All public comments on applications (including pre-application contributions) need to be published on the website, with the Council making clear how personal privacy can be ensured.
Society comments should always be published un-redacted if they follow the Council's criteria (8.29).
8. Planning permission documentation and Conditions should be made freely available to the public on the website, rather than as now, available only via the payment of fees.
This would allow the public to more easily monitor developments on site, ensure better compliance with Conditions, and provide assistance to the Council's Enforcement officers.
9. Decisions on Community Infrastructure Levy (CIL) proposals from the public are currently taken by the Council. But some of these proposals are being submitted by Councillors, and some by Council officers.
The public perception is that the CIL or 'community' funds may be being diverted to support schemes that should properly be funded by the Council in other ways.
The CIL submission and decision-making process should be reviewed.
10. 'Civic Societies' should be added to the list of organisations in Appendix B.
11. All Design Review Panel (DRP) meetings (8.10) should be open to the public, to reflect the Council's approach to 'open-ness'. Ensuring DRP members' 'independence' also needs to be kept under review, if the public is to have full confidence in its recommendations.
If developers do not agree to the public presence, then the scheme should not be considered by the DRP.
12. For the public to comment on and understand an application (usually on a small computer screen or tablet) then the drawings need to be both clear and adequate.
We see (even from architects), tiny lettering or faint line drawings that may be acceptable at A1 size on the applicant's CAD system, but which are impossible for the public to read. The Council's criteria around the adequacy of application material needs clarification and be passed to every potential applicant. Inadequate submissions are disrespectful to both the public and the whole planning system and should not be validated.
13. Council planning documents generally should be much shorter, have less "opt-out" clauses, and be easier to read/download for the public.
A 100-page Guide dealing solely with shopfront design should not be the model for the future.
14. Above all, Councils and developers have to commit to listen to the public, not just 'go through the motions'.
Learning to work with and use the public input creatively, with all its undoubted variability, will certainly not be easy to start with, for any Council or developer: or indeed for the public.

50 years ago, Skeffington's report on People and Planning provided a game-changing blueprint for bringing the public into the planning process.

The Council's call for ideas to modernise public involvement in planning is to be welcomed.
We now have the opportunity to move forward.

Yours Faithfully

Chris Goodair: Chairman, Wimbledon Society Planning and Environment Committee