

BRISTOL STATEMENT OF COMMUNITY INVOLVEMENT: CONSULTATION DRAFT JULY 2007

Combined response of the Bristol Civic Society and the Bristol Neighbourhood Planning Network Steering Group

Overall Assessment

Summary: We applaud and support the improvements to the Draft SCI of July 2007 over the rejected Draft SCI of January 2006, with two exceptions. First, the tests of soundness Number 8 (Review) and Number 9 (Policy for planning applications) are in our view not met but could be met with relatively small amendments detailed in the attached table. Second, The rest of the Draft SCI should be made more accessible and clear by small amendments of text listed in the table attached.

Comments:

1. There is much to applaud in the new Draft SCI. In contrast to the first Submission Draft of January 2006, the creation of this Draft did involve the community from its inception through a series of productive meetings including three workshop type sessions. We give special thanks and credit to the City Council Corporate Communications Manager, the Citywide Planning Policy Project Manager and officers of the Strategic and Citywide Policy Team for their concern for and attention to understanding and collecting the community view.
2. As a result of this frontloaded involvement, we see many positives in the new Draft of July 2007 that answer the community's concerns about the Submission Draft of January 2006:
 - (a) There now appears to be a big shift in intent on the part of the Council in favour of community involvement that is more than information giving or consultation.
 - (b) The SCI now commits to specific Ground Rules for the conduct of the involvement process that apply to developers and all the Departments of the Council and the community equally. When these are properly applied they will create the conditions for a true partnership between the key players in the planning process.
 - (c) There is now a clear commitment on the part of the Council to allocate the resources of money and manpower that are necessary to achieve effective community involvement.
 - (d) The role of local neighbourhood planning groups is embedded into the community involvement process as a prime means to making involvement effective by providing local expertise, enabling informed choice, linking development control with plan making and opening the opportunity for involvement to a wider section of the population.

3. We still see some weakness in the new Draft of July 2007 that can be corrected by small amendments to the text:

(a) We still see a lack of clarity and precision as to what the Council means by involvement; how it is fundamentally different from consultation or information giving and how the Council's conception might differ from the community's conception. This lack of clarity is compounded by an inconsistent use of language. "Involvement" sometimes becomes "engage" for no clear reason.

(b) We still sense that the Council sees involvement as necessary to serve the interests of the management of the planning process rather than as necessary to serve the interests of the community. The benefits listed at 2.3 all read as benefits to the system only.

(c) There is still a need for plainer English if the SCI is to work in promoting both effective involvement and involvement of people who see planning as a foreign land. Several paragraphs are still not intelligible even to the informed layperson.

Although these weaknesses are of detail and do not amount to making the document unsound, they are important in a document that is intended to promote community involvement. Detailed editing of the text, including obtaining a plain English Crystal Mark would make a good document better.

4. However, there are three further weaknesses that are more crucial and in our view if not amended make the document still unsound:

(a) The section on Review 5.6 to 5.11.

(b) The Section on involvement in development proposals and planning applications 6.1 to 6.9.

(c) The sub section on revisions to permissions or applications and conditions to permissions.

The detail of what we regard as the unsoundness of these sections is given in the attached analysis table. The reasons for these sections in our view not being sound include:

1. They do not represent a reasonable reflection of or response to the views given in the frontloaded community involvement workshops and correspondence, nor of Council officer oral and written opinion at the time.

2. These sections make a crucial difference to whether the involvement promoted in the rest of the SCI document is actually effective. The effectiveness of the process of involvement can only be tested through review (Section 5.6 through 5.11). The effectiveness of involvement through actual outcomes on the ground can only be tested through outcomes from development control (Section 6.) Unless the community can see the clear effect of involvement under these sections of the SCI then public cynicism in the planning process will increase and involvement will decline. This is the opposite of the purpose of the SCI.

3. The sections do not live up to what the community can reasonably expect from the legislation and Government planning policy statements PPS1 and PPS12.

4. The meaning of each section is not clear. The section on development proposals and planning permission is particularly difficult to follow both in logic and language. It is a fundamental requirement that the SCI must show clearly what is required of planning applicants and the community. This is not met.

We would be happy and willing to discuss our response. In the constructive spirit of partnership and continuing involvement that has occurred so far, we suggest a further workshop type meeting(s) involving the original participants from the community and officers of the Council, leading to the production of the Submission Draft SCI.

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John Payne (Chairman Civic Society); Alan Morris (Deputy Chair, Civic Society); Audrey Lennox (Civic Society Executive Committee); David Farnsworth (Civic Society Executive Committee); Alison Bromilow (Redland & Cotham); Andy King (Christmas Steps & Portland Square); Steve Pearce (Brislington).