

Letter to Working Group Members on Consultation – 18th March 2016

I last wrote to you on behalf of the Neighbourhood Plan Steering Group as you started work within one or other of the seven Working Groups producing text for our new draft Neighbourhood Plan. My letter set out several key points about how Working Groups (WGs) should approach their task. It has become plain from feedback and minutes from WGs that one area of activity could benefit from further elaboration.

The Steering Group is grateful for the thoughts which have emerged thus far within and without WGs on the subject of consultation. The issues raised were important enough to constitute a major item at the Steering Group's third meeting on 9 March. I am writing to you with further advice on this subject arising from the Steering Group's deliberations.

I start by re-iterating the key point which I made in my earlier letter and which I stressed in my double-page spread in the last issue of Dore to Door: *Working Groups should treat this as an inclusive exercise and should therefore err on the side of consulting widely and taking great care to consider any views expressed to them.* I say this for three main reasons:

- The recommended texts which you eventually produce will be the richer for you having sought the widest range of views and having weighed them carefully before deciding what to recommend.
- Consultation is not just about securing valuable evidence, but also about helping you to reach judgements about what is acceptable to the people of Dore – and however personally committed we are to doing our drafting work, we have to remember that this Plan will be Dore's neighbourhood Plan, not our private Plan.
- It has been impressed upon us by our local planning authorities, Sheffield City Council and the Peak District National Park Authority, and in the requirements flowing from the Localism Act that we must consult widely and effectively to ensure that our eventual draft Plan passes its compliance assessment process.

So, in short, any failures to appropriately consult will run the risk that our eventual draft Plan fails its compliance assessment and/or fails to secure the endorsement it needs to survive the referendum to which it will be subject. The last thing we want is sections of the Dore community who feel neglected or ignored turning into disaffected voters in the referendum or complainants to those conducting the compliance assessment.

Consultation can be said to go through several stages if it is to be effective:

1. It begins with **engagement**. This is where you identify the groups with which you would be wise to consult and you contact them to make it clear how much you would value the evidence they can provide, and that is not only factual evidence, but also their opinions. You are engaging to secure collaboration in the consultation you propose. It has been stressed that you should try to engage widely, including with hard-to-reach groups, like the young. You will be informing as well as consulting and engaging and doing this by explaining why you are seeking information from the potential consultees.
2. Then there is **evidence-gathering**. As I have said, evidence is not only information-gathering, but can also be seeking opinions. Usually when one is seeking opinions, one has already provided some tentative ideas against which they can express

views. However, it must not be forgotten that consultation will only be regarded as genuine and valuable when any proposals being made are at a formative stage. It is one of our strengths and our vulnerabilities that we already have a credible draft plan. The last thing we must do if we are to avoid the vulnerability is to give the impression that we regard the existing text as as good as a done deal. We must make it clear that the proposal we are consulting on is still very much an open issue so we genuinely welcome both information and comment.

3. Then there is **deliberative consultation** where you are definitely wanting to collectively interact with your consultees to shake out the issues and begin to reach some conclusions. Here you will definitely be putting clear ideas or proposals to your consultees beyond the stage where you are simply trying to garner information: you are openly giving the consultees the chance to influence your decision-making process. The result ought to be that the feedback gives you a chance to understand the impact of your proposal so that you can take a more informed and rational decision about what to recommend.
4. Finally there is a more **formal decision-making consultation** and this is primarily for the Steering Group to handle. It comes at the point when the Steering Group has a prima facie satisfactory draft Plan which is to be put out to a whole range of official consultees from the Environment Agency and local Planning Authorities to voluntary bodies whose activities benefit part of the Neighbourhood Area. At this stage we should be satisfied that we have a sound draft where all the sections hang together well and we are now seeking formal acceptance of our text or any formal comments which we are obliged to consider carefully and decide how to respond and what decisions to take about the text.

The emphasis throughout this is that when we consult we are impliedly saying that we guarantee that we will seriously listen to what consultees are saying, that we will consider their evidence and their views, and then decide how to proceed having taken appropriate account of their input (and of course that does not include doing what we intended to do in the first place when a consultee has raised valid points with planning policy implications).

It is in this context that we encourage Working Groups to consult across the first three of the bullet-points above. We recognise that points 2 and 3 may merge if you are not simply seeking factual evidence, but you are seeking views and opinion on tentative proposals. Consultation may be organised by survey, by letter or by interactive consultation 1 to 1 or in focus groups and face to face interaction can be very rewarding. I stress again, if you are to err it is in favour of more rather than less consultation, and don't hesitate to be imaginative about how it is conducted.

Where a proposal you have may have direct impact on a group's interests, such as wishing to seek a Conservation Area status for an area of Dore, it would be wrong not to consult the residents affected, but this would require in all likelihood offering to hold a meeting of such residents where the implications of such status could be explained before seeking informed views. Where the Housing Area Working Group is proposing to create character descriptions of the different housing areas, it would be hugely energising for the residents to be consulted on whether they felt the proposed descriptions were valid or could be improved upon.

The Steering Group will be considering at its fourth meeting in early April the basis on which it might arrange a major formative consultation event. This will only occur when the WGs have come forward with their sectional contributions and the Steering Group has been able to weave the contributions into a cohesive text which is advanced enough to be put out to such an event. Residents and interest groups would be invited to attend to meet the drafters

and see their work on show and to provide reactions. This would sit between bullet-points 3 and 4 above.

You will find in the minutes of the Steering Group's 9 March meeting (shortly to reach the DVS website) some reactions to specific proposals from WG meetings. Do please still consult the Steering Groups through David Crosby or any other SG member who sits on your WG on issues you want our view on.

There is one other significant matter which came up in our deliberations and that is the fact that in almost all cases WGs ended up with David Crosby as their Chair. The Steering Group had hoped that this would not be the case because of the pressure on David who is already the principal draftsman and planning expert. It also has the unfortunate effect that it looks uncomfortably close to the WGs being closely managed by the Dore Village Society trustees when that is not the DVS intention. At your next meeting I would like you to consider whether there is another WG member willing to take the chair to free up some of David's time and attention. If you cannot find an alternative Chair, I think you should minute that you tried to do so but had to confirm David as in the Chair. At least this will clear DVS of the criticism that it is entirely running the process.

Again, may I pass on the thanks of the Steering Group for the work you are doing.

Kind regards,
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