



Stakeholder Involvement

**Spatial Plans in Practice: Supporting the reform of local planning**



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# Contents

## **Chapter 1**

Executive summary 7

## **Chapter 2**

Introduction and approach 11

## **Chapter 3**

Key issues from previous spatial plans in practice research 17

## **Chapter 4**

Research findings 22

(i) Review of Statements of Community Involvement 22

(ii) Stakeholder survey 28

(iii) Round table discussion 33

## **Chapter 5**

Analysis and conclusions 37

## **Chapter 6**

Key lessons and recommendations 43

**References** 46

## **Annex 1**

Stakeholder questionnaire 48

## **Annex 2**

Agenda for stakeholder round table 51

# Chapter 1: Executive summary

## INTRODUCTION

**1.1** This study seeks to identify the extent to which the objectives associated with stakeholder involvement have been achieved through the implementation of Local Development Frameworks (LDFs). More specifically this piece of work will focus, where appropriate, on hard-to-reach groups and business interests as these have been identified as two particular sets of stakeholders with whom engagement has proved particularly difficult. The goal is to analyse the achievements and shortcomings of the new system and to suggest ways to achieve more effective community and stakeholder engagement. It concludes by recommending to local planning authorities, stakeholders and Communities and Local Government ways to achieve more effective stakeholder involvement.

## APPROACH

**1.2** The strategic surveys, longitudinal case studies and literature reviews of the Spatial Plans in Practice project contributed to this report, along with the following additional research:

- review of Statements of Community Involvement
- questionnaire survey emailed to stakeholders
- round table discussion with business and property interests.

**1.3** The key questions for the research were:

- to investigate the changes in stakeholder participation brought about by the requirements for LDFs
- to explore whether the planning reforms are leading to more inclusive community engagement through investigation of the involvement of hard-to-reach groups
- to explore whether stakeholders are engaging differently and earlier in the process through investigation with representatives of the development industry.

## RESEARCH FINDINGS

### Review of Statements of Community Involvement

**1.4** The new planning system is designed to be as inclusive as possible. Local planning authorities have been advised to use Statements of Community Involvement (SCIs) as 'tools of engagement' and to differentiate

approaches to stakeholder engagement at different stages of developing Development Plan Documents.

- 1.5** Many authorities have written and approved SCIs. The evidence suggests that while SCIs are useful tools for bringing together and stating local planning authority activity and aspirations, they have not in themselves been used effectively to engage stakeholders by explaining clearly how engagement will be carried out. There is little differentiation between the approaches used at different stages of community involvement, neither is there for different types of development plan document. In particular, SCIs are often too long, use impenetrable language and rarely address businesses and hard-to-reach groups directly. The complexity and technical language of the system is a considerable barrier to the engagement of non experts.
- 1.6** The National Planning Forum stated that the lack of resources to implement stakeholder involvement and consequent slippage in delivery may have held back the extent to which SCIs have had an impact. There are no performance targets for community involvement, and Friends of the Earth considered that this may be why local planning authorities give priority to other activities that do affect their Planning Delivery Grant.
- 1.7** The Local Government White Paper<sup>1</sup> proposes that the requirement for the independent examination of the LDF's SCI be repealed at the earliest opportunity. Many participants in this research, including the Planning Inspectorate, consider that the present independent examination of SCIs does not add real value to the process of ensuring that local planning authorities have a robust and effective approach to community involvement.

#### **Involvement of hard-to-reach groups and the business sector**

- 1.8** There is considerable scepticism among stakeholders that new attitudes to involvement are emerging and limited likelihood of the new system being accessible for hard-to-reach groups. However, the development of new involvement techniques and joint working, particularly with local strategic partnerships, could enable more effective stakeholder involvement and reduce the danger of consultation fatigue. Some local strategic partnerships appear to have engaged with local employers effectively, although this is not always the case. Local planning authorities could do more with others in the public sector to assist penetration of the community and efficiency of effort, both among public bodies and communities alike.

<sup>1</sup> Communities and Local Government (2006). *Strong and prosperous communities, The Local Government White Paper*.

- 1.9** Overall there is little evidence that the new system has improved the situation for the business sector. Businesses find the sheer quantity of engagement opportunities difficult to respond to and feel excluded from recognition by SCIs. The fact that representations and supporting evidence are required earlier in the planning process is found to bring about cash-flow difficulties and risk taking for companies, due to the need for greater spending up front. More planning authorities ought to hold separate stakeholder events with house builders to discuss issues of implementation and deliverability.
- 1.10** The private sector further finds the new planning system to be less flexible. In theory the core strategy is to be produced before other development plan documents, but the evidence base required for producing the housing allocations plan is also required to ensure that the core strategy is feasible. This suggests circularity in document preparation, making the new planning system less flexible from the private sector's point of view. However, it is difficult to be certain whether the first impressions of the system are justifiable, or whether these are signs of adjustment on all sides.
- 1.11** Not all stakeholders have appreciated the need for earlier engagement in the new planning system and would benefit from being more alert to the opportunities the process offers, not least because they might find themselves intervening too late to make a difference.

#### **TAKING FORWARD STAKEHOLDER INVOLVEMENT – RECOMMENDATIONS**

- 1.12** Based on the findings of the research the following key lessons and recommendations are made to the three audiences: local planning authorities, stakeholders and Communities and Local Government.
- 1.13** Local planning authorities are recommended to:
- utilise SCIs as tools of engagement and develop appropriate engagement strategies that set out who should be involved when, how and why
  - consider using different participatory approaches to different stages of involvement, and to different types of development plan document
  - clarify their understanding of hard-to-reach groups in their locality, and devise strategies and techniques that address their concerns
  - ensure that business/developer interests are recognised
  - partner other organisations to avoid participation fatigue and duplication, and to produce a more informative response.

**1.14** Stakeholders are recommended to:

- engage in LDF preparation as early as possible
- alter working practices by allocating resources to front-end activities
- engage with local strategic partnerships.

**1.15** Communities and Local Government is recommended to:

- consider altering the status of the SCI to a document that is required but should be produced and adopted by the local planning authority in consultation with the local strategic partnership
- consider the resources for stakeholder involvement in comparison with other areas of planning activity
- produce further guidance on the identification of hard-to-reach groups, dealing with the interests of the development industry, and on approaches to stakeholder involvement appropriate at different stages of different development plan documents.

## Chapter 2: Introduction and approach

### BACKGROUND

- 2.1** Stakeholder involvement has been an important component of the planning system for many years. It is intended to improve the delivery of essential services, to help ensure that people's needs are being met, and to increase legitimacy among stakeholders of decisions made by local planning authorities. Achieving a sense of ownership of local policy decisions and legitimacy for the development plan documents will minimise the need for a lengthy and controversial examination process. The new system is to provide opportunities for early community involvement, transparency and accessibility. The community is to know how and when they will be involved in the preparation of local development documents and how they will be consulted on planning applications<sup>2</sup>. Stakeholder involvement is allowed for in the preparation of all development plan documents and the Statement of Community Involvement (SCI).
- 2.2** SCIs are a new feature of the process of producing development plans. They were intended to set out standards for involving the community in the production of local development framework documents. They are required to be clear and conform to the Planning and Compulsory Purchase Act (2004). They should also link to other community involvement initiatives. Local planning authorities are encouraged to consider how the principles of involvement apply to different types of development plan documents and at different stages in the process.
- 2.3** The current process for producing development plan documents (DPDs) includes three separate statutory requirements for consultation: 'pre-submission consultation' (referred to as 'issues and options'), 'pre-submission participation' (referred to as 'preferred options') and at submission of the final proposals. 'Issues and options' is where the local authority is required to consult with 'specific' and 'general' consultation bodies as it deems appropriate. In practice, local authorities are often involving the general public at this stage. 'Preferred Options' is a pre-submission consultation document. Comments received on this document will feed into the production of a DPD that will be submitted to the Secretary of State for approval. Once the DPD is submitted, any person is allowed to make representations on it, thus in effect offering a third 'window' for consultation.

<sup>2</sup> ODPM (2004a). *Planning Policy Statement 12: Local Development Frameworks*.

**2.4** The reformed planning system is designed to offer the business sector a speedier adoption of development plans, leading to more clarity and less financial risk. Further, the requirements for planning applications are to be agreed earlier and decisions delivered faster, avoiding the refusal and resubmitting of applications. In turn the new planning system expects the development industry to engage in processes earlier by submitting representations and supporting evidence, to front load, and to involve stakeholders more than in the former system.

## **AIMS**

**2.5** This study seeks to identify the extent to which the objectives associated with stakeholder involvement have been achieved through the implementation of Local Development Frameworks (LDFs). More specifically, this piece of work will focus, where appropriate, on hard-to-reach groups and business interests as these have been identified as two particular sets of stakeholders with whom engagement has proved particularly difficult. The goal is to analyse the achievements and shortcomings of the new system and to suggest ways to achieve more effective community and stakeholder engagement.

**2.6** This Thematic Study has the following aims:

- to investigate the changes in stakeholder participation brought about by the requirements for LDFs
- to explore whether the planning reforms are leading to more inclusive community engagement through investigation of the involvement of hard-to-reach groups
- to explore whether stakeholders are engaging differently and earlier in the process through investigation with representatives of the development industry.

## **SPATIAL PLANS IN PRACTICE**

**2.7** The importance of effective participation is recognised by the Spatial Plans in Practice project; the theme of 'effective participation' is one of the five core themes and one which the project will return to throughout the research programme. This study draws upon and adds to previous work undertaken within the Spatial Plans in Practice project<sup>3</sup>. It seeks to determine progress made on engaging hard-to-reach groups as these are by definition among the most difficult stakeholders to involve. Further attention will be given to the private sector to establish how businesses are handling the increased requirements for stakeholder involvement.

<sup>3</sup> ODPM (2005). *Spatial Plans in Practice: Bulletin 1*.

- 2.8** The Spatial Plans in Practice project has already undertaken a number of investigations in relation to this theme. The strategic survey is a questionnaire survey of all local planning authorities in England and two rounds of this have already been conducted (the first administered by the Local Government Association (LGA)). It is designed to assess progress in document preparation for LDFs and as part of this to record local planning authorities' approaches to and views on community engagement.<sup>4</sup>
- 2.9** The longitudinal case studies of local planning authorities are another component of the Spatial Plans in Practice project. This study draws on the findings from interviews with those involved with the case study authorities, which have been identified to study in-depth throughout the project. Two rounds of local authority visits have taken place and stakeholders have been interviewed as well as LDF teams and their political and officer colleagues.
- 2.10** Finally, three literature reviews provide background knowledge and understanding that inform this thematic study. In particular the review on *Achieving Successful Participation*<sup>5</sup> has provided much of the theoretical underpinning of this study and provided the framework within which the findings have been analysed.

## APPROACH

- 2.11** Research for this study has involved first a review of SCIs; second a questionnaire survey to representatives of stakeholders; finally a round table discussion with business and property industry interests.

### Review of Statements of Community Involvement

- 2.12** Twenty-three SCIs were reviewed to identify progress and new approaches towards stakeholder involvement. The sample of SCIs was chosen in part from the authorities investigated through the longitudinal case study, and in part from advice given by the partner organisations involved in Spatial Plans in Practice including the Planning Inspectorate. SCIs from the following local authorities were reviewed:

- Bracknell Forest Borough Council
- Bristol City Council
- North Cornwall District Council
- North Northamptonshire authorities

<sup>4</sup> ODPM (2006). *Spatial Plans in Practice: Supporting the reform of local planning – Inception Report*.

<sup>5</sup> www.Mark Baker, Jon Coaffee and Graeme Sherriff (2006). *Literature Review 3: Achieving Successful Participation*.

- Broadland District Council
- Chelmsford Borough Council
- Doncaster Metropolitan Borough Council
- Epsom and Ewell Borough Council
- Forest Heath District Council
- Hambleton District Council
- Lake District National Park Authority
- London Borough of Hounslow
- London Borough of Islington
- Macclesfield Borough Council
- Northampton Borough Council
- Plymouth City Council
- Reading Borough Council
- St. Helens Metropolitan Borough Council
- Stratford-on-Avon District Council
- Walsall Metropolitan Borough Council
- Warrington Borough Council
- West Berkshire Council
- West Devon Borough Council

**2.13** To determine whether the new system has prompted new approaches to involvement, the SCIs were assessed for evidence of going beyond traditional methods and including more innovative and inclusive techniques. The SCIs were also assessed against criteria such as clarity, length, presentation, references to partnerships, strategies to save and effectively increase resources, and the identification and engagement of hard-to-reach groups.

**2.14** The findings were subsequently discussed with a representative of the Planning Inspectorate to test their validity and to compare with the Inspectorate's experience in dealing with the emerging SCI documents.

#### Stakeholder survey

**2.15** The main purpose of the stakeholder survey was to assess whether the new planning system is prompting new attitudes to engagement and whether the interests of stakeholders are being accommodated by the new procedures. The Advisory Group members of the Spatial Plans in Practice project are the national representatives of a network of regionally and locally based interests who are in close contact with local planning authorities. The survey sought responses on the following issues:

- the extent to which their members felt able to access the plan-making process
- the impact of SCIs in changing attitudes to involvement
- the extent to which methods of engagement are being utilised appropriately
- whether specific objectives of the new system such as front loading and capacity building are being achieved
- whether the new system is helping stakeholders to meet their objectives of engagement in the planning system.

**2.16** Respondents were invited to identify further examples of good practice and to identify further contacts who might contribute to the research. (See Annex 1 for the full questionnaire.)

**2.17** An email attaching the research questionnaire and a covering letter was circulated in July 2006 to 23 representatives of different stakeholder interests varying in type from government agencies to federations of private sector interests to non-government organisations. By the end of August, ten positive responses had been received which equates to a response rate of 43 percent.

**2.18** Survey responses were received from:

- Local Government Association
- Royal Town Planning Institute
- Royal Society for the Protection of Birds
- Home Builders Federation
- Friends of the Earth
- National Planning Forum
- The Countryside Agency
- English Partnerships
- Commission for Architecture and the Built Environment
- English Nature.

**2.19** In addition a face-to-face interview was conducted with a regional Planning Aid Coordinator and he was able to provide further views from the national manager and other regional representatives. Information provided by the South-East Regional Policy Manager of the Home Builders Federation during the first round of longitudinal case studies has been used to supplement the findings.

### Round table discussion

**2.20** Despite attempts to attract interest from a broader group of representatives the round table discussion arranged by the Home Builders Federation (HBF) only included representatives from the Confederation of British Industry (CBI) and English Partnerships (EP). The discussion sought business and the development industry's views on the new planning system and in particular their ability to engage with it. The agenda for that meeting (see Annex 2) covered ground similar to that of the questionnaire survey, but modified to address the particular interests of those present.

**2.21** The specific questions addressed issues as follows:

- their ability to access the planning system
- the role of the SCI in engagement
- their experience of front loading
- meeting their objectives through involvement
- examples of good/bad practice
- the cost impact of involvement.

### AUDIENCE

**2.22** There are three key audiences for this report: local planning authorities, stakeholders and Communities and Local Government. Chapter 6 sets out recommendations for each audience based on the findings of this research.

## Chapter 3: Key issues from previous spatial plans in practice research

### INTRODUCTION

**3.1** This chapter explores concepts and issues of stakeholder involvement which have been derived from findings of Spatial Plans in Practice literature reviews and strategic survey. These identify the stakeholders, barriers to participation and criteria for effective participation, which this study builds on. In addition, the findings from the strategic survey and longitudinal case studies are explored to provide evidence about current practice.

### WHO ARE THE STAKEHOLDERS?

**3.2** The Achieving Successful Participation literature review<sup>6</sup> identified that a stakeholder can be seen as “any individual or group who can affect or is affected by the actions, decisions, policies, practices, or goals of the organisation” (from Carroll, 1996). This might include policy makers, beneficiaries of services, regulators, planners, government, community and voluntary organisations. The Culture Change in Planning literature review<sup>6</sup> recognised that there may be more than 100 different stakeholders with whom planners need to engage (from ODPM, 2004b).

**3.3** The following main types of stakeholder can be identified:

- the local authority itself and the key sectoral interests within the authority for which spatial planning provides a critical mechanism for delivering their corporate objectives
- critical stakeholders external to the local authority, eg the local strategic partnership and its members, parish councils, and area committees
- neighbouring authorities
- the general public, which includes stakeholders such as local communities, comprising individual residents, residents’ associations, and amenity or interest groups
- statutory consultees, such as governmental agencies and utility providers
- further stakeholders including other agencies and organisations/service providers – such as health trusts (or Primary Care Trusts), educational establishments, transport providers, emergency services, and community development organizations

<sup>6</sup> Dave Shaw (2006). *Literature Review 2: Culture Change and Planning*.

- the development industry and landowners engaged in planning processes
- the business sector, including business representatives such as Chambers of Commerce.

**3.4** This study concentrates on the hard-to-reach groups among the general public, and the business sector stakeholders including the development industry, rather than other public sector agencies or local authorities on the basis that statutory consultees are less difficult to engage with than those who have to take the initiative for themselves.

### KEY ISSUES FOR EFFECTIVE PARTICIPATION

**3.5** The Achieving Successful Participation literature review (para 4.12-19) identified a number of key barriers to participation that need to be overcome if the process for stakeholder involvement is to be effective:

- *approaches to stakeholder involvement, institutional settings and the form of consultation events*: Traditional approaches can be remote, un-engaging and even off-putting for some stakeholders. For example, formal meetings may intimidate stakeholders if they are unfamiliar with such environments. There is a need for more interactive, innovative approaches to aid inclusivity. This requires skilled facilitators to encourage involvement of all parties and more pro-active approaches such as going out to meet certain stakeholders in non-intimidating settings such as their 'own turf'
- *lack of interest and/or consultation 'fatigue'*: Stakeholders may not be interested in planning in their area and, even if they are interested, other events may have priority. Furthermore, stakeholders who have attempted to engage in the planning system in the past may have been disappointed and feel that their effort has not brought about any results. Previously- motivated stakeholders may also become subject to consultation fatigue
- *involving 'hard-to-reach' groups*: As the phrase suggests, traditional methods have had limited success in reaching hard-to-reach groups, which has led to expectations of improvement within the new planning system. The list of stakeholders that are hard to reach is extensive, comprising the uneducated and socially deprived, elderly, youths, students, people with little time and interest, people in hospitals, homeless, gypsies, commuters, asylum seekers and refugees. With many of these groups there are also cultural and language barriers to overcome. Furthermore, these hard-to-reach groups, and their representatives, change location and status more rapidly over time and

are more difficult to contact than organised voluntary and community groups. Whilst new methods of involvement are designed to achieve greater participation, a trade-off between resources spent on engaging minority groups and the effectiveness and outcome of participation is inevitable

- *funding for new, more innovative approaches*: A further impediment to participation is finding additional funding which will be required to overcome the identified barriers. Local planning authorities may struggle to provide the necessary resources to devise and implement innovative approaches to stakeholder involvement
- *lack of guidance*: Stakeholders, including businesses in the development industry and landowners, are expected to put more emphasis on front loading which will only be achieved if guidance on how early engagement can be undertaken from a business perspective is available and understood. Further, the business sector is likely to need clear guidance as to which stakeholders should be involved for different types of proposals. More generally, there is a need for better guidance, and even community education, on the role and purpose of the planning system and how stakeholders can get involved more effectively.

**3.6** From the literature review, it is possible to identify key criteria which relate to 'effective participation in plan making'. These criteria can be grouped into six broad areas:

- meeting procedural and statutory requirements, such as the need to make participation a central part of the plan-making process; to prepare a SCI and consult widely on its proposals; and to provide adequate information on the consultation process
- the broad approaches adopted, such as the use of innovative and inclusive approaches
- ensuring inclusiveness, making sure that no stakeholders (or stakeholder groups) have been excluded or have dominated the process unreasonably
- whether the results of stakeholder involvement and the consultation processes were utilized in subsequent plan making and policy formulation and thus made a difference to the eventual policy outcomes
- the linkages between participation in the LDF process and other stakeholder involvement processes, particularly those relating to the community plan and local strategic partnership

- front loading, which means engaging with stakeholders on key choices before firm decisions have been made. Front loading requires the identification and assessment of all issues and options; sharing information; gathering evidence to inform policies and proposals; adhering to decisions and not submitting changes during the examination process (from Rozee, 2006).

## **STRATEGIC SURVEY FINDINGS**

- 3.7** The strategic surveys have an important role in information gathering and collation of views from local planning authorities. The first survey was undertaken by the Local Government Association (LGA) in 2005, while the second survey, conducted in Spring 2006, sought to identify progress in plan making and, among other things, how stakeholder involvement is being addressed and managed differently. The 2006 survey had a 50 per cent response rate.
- 3.8** It found that local planning authorities are making progress on the production of SCIs. In Spring 2006, 31 per cent of local planning authorities responding had reached the preparation and submission stage and 13 per cent had adopted the SCI. Local planning authorities are therefore considering future methods of stakeholder involvement. Thus far, a significant majority of local planning authorities expressed the view that it is easy to engage with statutory consultees, developers, elected members and other public sector partners. However, planning authorities' opinions were fairly evenly split on how easy it has been to engage local communities in the development of the LDF. 36 per cent of local planning authorities found it difficult to engage with local communities, 34 per cent found it easy, while 30 per cent responded with 'neither easy nor difficult'.
- 3.9** Regarding the means of engagement in the preparation of DPDs, 65 per cent of planning authorities have engaged with the community in the past through public meetings, exhibitions and leafleting, and the same percentage of authorities plan to use these methods in the future, both at the 'issues and options' stage and at the 'preferred options' stage. This approach to community engagement has not changed in the past 12 months, by comparison with the LGA's findings report. Although few local planning authorities have previously engaged with the community through focus groups and interactive websites, the majority of local planning authorities intend to utilise these methods at the 'issues and options' and 'preferred options' stages, which indicates progress in using more modern methods of community engagement.

- 3.10** While there appears to be progress on the methods and confidence in the ease of stakeholder involvement, local planning authorities plan to engage with the same bodies as they have in the past. These include county councils, transport operators, developers, major landowners, utility providers, locally-based community groups and voluntary organisations. Only about 50 per cent of the local planning authorities said they had previously engaged with regeneration partnerships; over 60 per cent intend to do so in the next stages, which suggests a further area of progress.
- 3.11** Local planning authorities appear confident that their stakeholder involvement will be beneficial to planning in all respects, particularly in helping to inform all parties, in producing a sounder submission document and contributing to better policies. In general, local planning authorities are more optimistic about the effectiveness of the LDF process compared with the LGA's report in 2005. 62 per cent of local planning authorities surveyed in 2006 agreed that relative to the local plan, the LDF would deliver stronger community and stakeholder involvement, while 22 per cent disagreed and 16 per cent remained impartial. All in all, views on comparative benefits of the new system reveal good support for the planning system delivering on all its main objectives except speed and early decision making. 46 per cent of local planning authorities disagreed that the LDF would deliver earlier decision making and 65 per cent disagreed that the new system would deliver quicker plan preparation.

### LONGITUDINAL CASE STUDIES

- 3.12** The findings of the case study authorities are reported in *Lessons Reports 1 and 2: Making timely progress and the integration of policy*<sup>7</sup>, and *Using evidence in spatial planning*<sup>8</sup>. Among those findings the beneficial impact of engagement with local strategic partnerships is highlighted, and seen as more helpful than attempting to draw on sustainable community strategies that are often generalised in form. At their best, local strategic partnerships provide an established and accessible network of partners familiar with the plan area and its community. These reports cite examples of good practice from different sectors including health, environment and parishes involving the local strategic partnership.

<sup>7</sup> Baker Associates et al. (2006). *Lessons report 1: Making timely progress and the integration of policy*.

<sup>8</sup> Baker Associates et al. (2007). *Lessons report 2: Using evidence in spatial planning*.

## Chapter 4: Research findings

### (i) REVIEW OF STATEMENTS OF COMMUNITY INVOLVEMENT

#### 4.1 The findings deal with matters of:

- style and accessibility – does the document in itself lead to greater possibilities of involvement?
- innovation – to what extent is there evidence of innovative practice?
- the hard-to-reach groups – is there evidence of local planning authorities going to and engaging with the hard-to-reach groups?
- resources – is there a commitment to match the expectation of greater engagement with a similar commitment to more resources?
- partnering – have the opportunities of partnering and joint working been identified and exploited?

#### Style and accessibility of Statements of Community Involvement

**4.2** Many of the SCIs reviewed were broad and generic, used complicated terminology, and were often too long. The SCIs were vague when describing approaches to stakeholder involvement and numerous SCIs admit to simply building on traditional methods (eg, Hounslow). SCIs frequently include information that is not relevant to the public. For example, Epsom and Ewell Borough Council's SCI sets out the strengths and weaknesses as well as the resource and cost implications of various types of consultation methods.

**4.3** In some cases, hard-to-reach groups are not mentioned and when groups are listed there is no indication of how and when they will be engaged. For example, the hard-to-reach groups Epsom and Ewell Borough Council identifies are gypsies and travellers; people in hospitals; asylum seekers and refugees; homeless persons; students; tourists and commuters. The only further reference made to hard-to-reach groups is an annotation to the Local Strategic Partnership that states "useful for targeting 'hard-to-reach' groups". There is no indication of how individuals will be identified and engaged.

**4.4** There are however, good examples of SCIs that are written for the community. Bristol City Council's SCI is easy to read, well presented, colourful, only 25 pages long and provides contact details for further queries. Walsall Council's SCI uses colloquial terminology and the appendix includes a 'Jargon Buster' as opposed to 'definition of terms'. Best practice examples are highlighted in boxes and 'signposts' throughout the

document to facilitate access to information. However, the document is 61 pages long including the appendix.

### Innovative methods of involvement and hard-to-reach groups

- 4.5** The Achieving Successful Participation literature review refers to the Leach and Wingfield (1999) typology of methods of participation; 'traditional', 'customer-oriented', 'innovative consultation', and 'innovative deliberation'. From our research these newer methods can be distinguished on the basis of the following criteria: the first criterion can be defined as either 'long-term measures' or 'immediate measures'; the second can be described as 'in-breadth' and 'in-depth' methods of consultation and the third can be considered as 'come to us' or 'go to you' approaches.
- 4.6** The third category provides the best examples of what innovative practices of consultation could be. Traditional approaches tend to encourage community members and stakeholders to "come to us" and view plans and proposals at local authority specified locations. This approach does not engage the hard-to-reach groups. More innovative approaches take the opposite stance by actually "going to" people and localities and engaging in face-to-face activities such as meetings and workshops. Focus groups can be targeted at particular sections of local communities, such as hard-to-reach groups, to receive responses from those not normally motivated to get involved.
- 4.7** New approaches towards community and stakeholder involvement are occurring at different and varied scales of operation. At one end of the spectrum, there are large-scale council-wide attempts at engagement, such as the use of parish councils and area committees. At the other end, refined methods include targeted literature for a specific consultee, topic and time. An important observation made is that, from a process point of view, new methods of involvement appear to be reliant upon achieving a balance of approaches at different scales.
- 4.8** From reviewing methods of involvement, Sustainable Community Assessments, Area Plans, Neighbourhood Plans and Parish Plans provide an opportunity for people to get involved in the planning system. Road shows and display stalls are good examples of involvement methods (Hounslow, Plymouth, West Berkshire) but more importantly, they are prime examples of 'going to' communities and stakeholders and potentially a means of engaging hard-to-reach groups.

- 4.9** Consultation Toolkits (West Berkshire, Reading) could be considered good practice and perhaps quite innovative as they outline local authority procedures towards consultation that are unique to that authority. Consultation Toolkits provide the most comprehensive explanations of how, what and why techniques should be used. West Berkshire highlights ‘partnered meetings’ rather than ‘one-on-one meetings’, as hard-to-reach individuals are more likely to come with a friend than by themselves.
- 4.10** Bringing people together is also a noticeable theme. Forums and representative groups (Reading, Plymouth) allow for good cross sections of views, and workshops such as *Planning for Real* (Reading, Bristol) and *Enquiry by Design* (Reading, West Berkshire, Northampton) allow communities and stakeholders to engage in the details of site specific areas and area based policy. Additional techniques employed are holding an event twice, at different times of the day in order to maximise attendance (Broadland). Bristol City Council has set up a website, [Askbristol.com](http://Askbristol.com), which contains a range of consultations that include surveys, discussion groups as well as live question and answer sessions. This has the potential to be a useful new means of involvement, as online live question and answer sessions are highly accessible and more likely to attract young people than formal public meetings.
- 4.11** The ‘going-to’ approach also entails seeking feed-back from the stakeholders on the methods of engagement to improve consultation in the future. Walsall Borough Metropolitan Council proposes to review involvement techniques by using evaluation forms to receive comments from the community. A further method of making meetings and events more accommodating is by providing childcare or paying carers allowance to participants (eg, Broadland).
- 4.12** Walsall Council proposes to use new communication techniques such as mobile texting and community information plasma screens which are to be developed across the Borough by the Walsall Borough Strategic Partnership. Broadland District Council proposes to provide induction loop systems for those who are hard of hearing and interpreters at events.

#### Resource management

- 4.13** The following section highlights cases where local planning authorities have developed innovative methods of resource management, which will release funding for new approaches to stakeholder involvement.
- 4.14** Whilst building on current methods may not produce the most innovative approach to consultation, Hounslow employs an e-government strategy

that counter-balances this. Hounslow are relying on easy access to their website and emailing consultees to reduce production costs of hard copy plans, which leaves a greater budget for consultation activities.

- 4.15** Forest Heath District Council has planned their budget for consultation into the LDF preparation. The SCI states that planning resources from the years 2004/05 and 2005/06 take into account the need to fund community and stakeholder involvement. Planning the budget to fund stakeholder involvement is a prime example of good practice. It should allow them to put more funding into developing innovative methods. From Friends of the Earth representative's point of view, one of the reasons why this forward planning approach is not taken by other local planning authorities may be that unlike development control, local authorities are not set service performance targets for community involvement, which is why local planning authorities are likely to give priority to, and invest in meeting other targets. The priority of meeting development control targets in determining levels of Planning Delivery Grant could discourage investment in innovative methods of stakeholder involvement.
- 4.16** In addition to budgeting for current methods of involvement, local planning authorities will consider the value for money for new communication techniques such as mobile texting, plasma screens, hearing aid systems, interpreters, and the provision of childcare.
- 4.17** Consultation fatigue is a constant concern of local planning authorities. Bristol City Council seeks to reflect the ongoing consultation undertaken within the City to avoid duplication. As well as saving resource, this is an example of partnership working.

#### Joint working and partnerships

- 4.18** Examples of joint consultation that double up involvement activities with local strategic partnerships have been found (Chelmsford, Northampton, Reading). Partnership working can facilitate the identification of hard-to-reach groups. Bristol City Council intends to establish links with the Equalities Action Group, to identify groups that have not traditionally been involved in the planning system, through attending meetings and undertaking written consultation. The Council further proposes to use the Council for Voluntary Services for Bristol, which represents over 600 community groups, voluntary organisations and social enterprise organisations, to ensure that a comprehensive range of groups are involved in the LDF.

- 4.19** West Berkshire Council has implemented a scheme in which they pool their resources with other council departments in an attempt to extend their LDF budget. The Council has also appointed a Partnerships Officer to coordinate consultations across sectors. Joint working can therefore help to achieve the Government's objective of increasing front loading of involvement.
- 4.20** There is further evidence of joint working at Plymouth City Council who co-ordinate their LDF staff with other sectors. This allows them to focus on targeting hard-to-reach groups. In some authorities (Northampton, Chelmsford), it is noted within the SCI that resources are scarce, and that outside help from eg planning consultants and developers is needed. On the one hand, employing outside help could be considered an example of good practice as it will allow communities and stakeholders to benefit from the knowledge and expertise of planning agents and organisations that can bring with them new, innovative methods of consultation. On the other hand, anecdotal evidence suggests there is the danger that developers engaged in consultation will focus on marketing their plans (public relations) rather than allowing for participation.
- 4.21** Planning Aid is a commonly-used service among local planning authorities (e.g. Hounslow). It offers a valuable way for local planning authorities with limited resources to gain expert guidance, thereby improving their performance and increasing communities' ability to engage with the planning process. Planning Aid has developed, with the support of Communities and Local Government, an approach to community engagement based on experience around the country and supported by community officers in each region. The East Midlands Planning Aid is in the process of developing a Community Planning Service alongside Northampton Borough Council and the Northampton Local Strategic Partnership, which will help build capacity among communities.
- 4.22** Northampton Borough Council and their local strategic partnership provide a good example of partnership working. The sustainable community strategy consists of a number of themes, one of which is concerned with 'engaging with the community'. The SCI continues this theme, which allowed them to tap into the community and stakeholder networks of the local strategic partnership. Similarly, Bristol City Council engaged with the Bristol Partnership to establish Delivery and Action Groups.
- 4.23** A further good example of partnership working is provided by Walsall Council, which has set up a Statement of Community Involvement steering

group to oversee its production and content. The steering group consists of representatives of the community and Walsall Borough Strategic Partnership, Local Neighbourhood Partnerships, Walsall Community Empowerment Network, Walsall New Deal for Communities as well as officers from Walsall's core consultation group and equalities section.

#### Meeting at the Planning Inspectorate (August 2006)

- 4.24** The findings recorded above were discussed in a meeting with a representative of the Planning Inspectorate (PINS). He supported the findings, based on the experience of the 50 per cent of local planning authorities which had submitted their SCI to that date.
- 4.25** The SCIs reportedly show large regional variations in quality. Most weaknesses that the Planning Inspectorate identified when reviewing the SCIs concerned regulatory problems. For instance, some local planning authorities had not consulted adjoining authorities and parish councils.
- 4.26** In many cases the excessive length and poor comprehensibility of documents are considered problems and sections on hard-to-reach groups were usually considered to be weak. On techniques there are frequently long lists of approaches but the Inspectorate observed that "innovation is rare" and methods of stakeholder involvement are not usually modified to suit specific development plan documents or stages in the process. The Inspectorate considered that there is little evidence of culture change at this stage.
- 4.27** While most SCIs are good on who to consult and when (guidance on this is set out in PPS12), generally the section dealing with resources is weak. The Inspectorate's view was that it is not only difficult for local planning authorities to predict and allocate resources for community engagement, but that it is also difficult for PINS to advise authorities on this subject.
- 4.28** Some local planning authorities are not able to meet the requirement of providing the SCI translated into sufficient different languages. For example, the London Boroughs and Leicester may encompass over 120 languages. These authorities have agreed to provide a translated summary of the SCI if required.
- 4.29** A significant proportion of representations on SCI are made by the development industry and are negative in nature, with complaints that there are too many requirements to be met. According to PINS, the private sector's view is that their interests do not seem to be taken into account in the production of SCIs, and they frequently see the involvement of

the public as unhelpful due to the high costs incurred relative to the consultation outcome.

- 4.30** Overall, the Planning Inspectorate considers that the present independent examination of SCIs does not contribute to ensuring that local planning authorities have a robust and effective approach to community involvement. There has been very little use by stakeholders of the opportunity to engage in the process of SCI production with rarely more than 50 representations being made on a single SCI and often fewer than 20. In the main objections come from private individuals and may not be of any direct relevance to the document. There are a number of potential reasons for this including: SCIs are too difficult to understand; stakeholders are not aware that consultation is being undertaken; lack of interest as public/businesses do not see a direct link between the document and changes in their neighbourhood/development proposals; in some cases individual members of the public are thought to waste PINS time at the examination; and members of the public may not understand the purpose of consultation on SCI.

#### **(ii) STAKEHOLDER SURVEY**

- 4.31** The stakeholder survey sought opinions from members of the Spatial Plans in Practice Advisory Group on whether the new planning system is prompting new approaches to involvement, whether these are accommodated readily by the new procedures and whether future participation is likely to be more inclusive and effective. The original survey questions are included in the summary of responses for clarification.

*(i) Access – The new system is designed to allow for fair access and opportunity to participate for all members of the community. Do you feel your members are able to access the process readily and can you give examples of where successful approaches have been adopted?*

- 4.32** Responses to this question divided according to whether the respondent represented a statutory consultee or not. Statutory consultees find no difficulty engaging with the process for obvious reasons but they do have problems caused by the sheer volume of consultation expected of them.
- 4.33** The non-government organisations find the new system less satisfactory than the statutory consultees. For a variety of reasons the new system imposes considerable obstacles to potential participants including the length of documents, the language and the complexity of the process. “The planning system makes little sense to anyone other than the well informed” Royal Town Planning Institute (RTPI). The Royal Society for the

Protection of Birds (RSPB) representative elaborates, explaining that it is often difficult to interrogate council websites (a point also made by HBF) because planning functions may be disaggregated around the organisation and consequently it is problematic to identify the relevant documents. At a more fundamental level they claim that “people are still potentially unclear of the benefits to them of engaging in the development plan system.”

- 4.34** There are good examples of stakeholder involvement but, according to the Friends of the Earth representative, there is no evidence that it is a result of the new planning system. The National Planning Forum representative suggests that combining consultations with those on sustainable community strategies and facilitated discussions with mixed groups are likely to allow for fair access and to be most productive.

*(ii) SCI – Have you any evidence that SCIs are changing stakeholders’ understanding of planning issues and that they are being used for this purpose? Equally is there evidence that the production of SCIs is changing the thinking of planners about the practice of engagement?*

- 4.35** There is considerable scepticism of the benefits of SCIs among some respondents. The Friends of the Earth representative is clear that neither planners’ nor stakeholders’ views of planning issues are being altered by SCI production. Planning Aid’s representative finds the documents “not user friendly” and that they are frequently “long on aims and short on engagement exercises”. The Friends of the Earth representative describes SCIs as “tick box exercises”, while the representative of the Commission for Architecture and the Built Environment (CABE) suggested they contribute to “consultation fatigue”. Similarly, the LGA representative suggested that some stakeholders are querying the value of being consulted on how they are to be consulted and that there is a “real danger of consultation overload”. English Partnerships (EP) consider in their experience “the majority of comments made appear to come from established stakeholders.”

- 4.36** Planning Aid’s representative considers SCIs to have merit as documents but in their present form to be inadequate, not least because most evade the question of sufficient resources or when or why they may need to be reviewed. While the process of SCI revision through three stages of community involvement provides an opportunity for improvement, and there are examples of some benefiting from this, there is no requirement for a consultation report to be produced. In most SCIs there is little information on how information will be fed back to the public. It is also felt that more public-oriented versions of the document should be produced “to try and seriously engage the public” (Planning Aid).

**4.37** In contrast, the RTPI and LGA representatives responded that anecdotal evidence suggested that planners have been made to think differently about consultation and involvement. LGA's representative believes that new and improved practice has been included in the SCIs as a result. In addition, the National Planning Forum representative considers SCIs to be a starting point and that they may have helped planners in changing thinking about the possibilities and the necessary project framework, yet the lack of resources and timescales are thought to have held back the extent to which SCIs have had an impact.

*(iii) Methods of Involvement – Methods of community involvement should be fit for purpose in that they allow stakeholders and other interested parties to participate at the appropriate stage. What specific methods being used by which authorities would you point to? Are these enabling participation at the appropriate stage?*

**4.38** Respondents were able to point to good methods and authorities although there were reservations about the universality of progress. English Partnerships have worked with a number of local planning authorities using *Enquiry by Design* techniques "with considerable success," but as they point out, these were very specific tangible projects rather than more general development plan documents. CABE's representative lists other specific techniques such as *Planning for Real*, *Charettes* and *Placecheck*. The Countryside Agency representative considers that "early involvement . . . is critical if stakeholders are to fully inform policy development" and cites the establishment of development fora involving stakeholders and the setting up of an on-line database as examples of good practice. RSPB's representative believes "that more direct methods such as the use of leaflets or letters to households is effective in raising public awareness." The National Planning Forum representative believes that good methods of involvement will emerge and that it will be important that these fit the circumstances in each area.

**4.39** The Friends of the Earth representative is concerned with "the danger that some local planning authorities leave the entire master planning and consultation to the developers due to resource constraints." This he believes can lead to public relations exercises rather than independent public consultation and raises questions of legitimacy and compromises the arbiter role of authorities. Planning Aid's representative also identifies dangers in the use of consultation exercises to promote and advertise development proposals. There is a danger that the impression is given that the public can influence development proposals to a great extent which may then be seen as misleading by people who understand planning processes and would find constrained choice more realistic.

- 4.40** Planning Aid's representative is critical that few local authorities provide any evidence for identifying hard-to-reach groups. Consequently some groups, eg "the very mobile in the private rented sector" are omitted from consideration. In addition his view is that there is too much emphasis on the formal and insufficient on more "fun" methods.
- 4.41** HBF consider themselves as key stakeholders but find they are frequently omitted from SCI consultee listings and swamped by parish councillors and Campaign to Protect Rural England (CPRE) representatives at consultation events. The HBF representative welcomes the development industry-only events arranged by some authorities.

*(iv) Front loading – Is there any evidence of front loading in the preparation of development plan documents and that facilitating early involvement is working? Will it, in your opinion, succeed in achieving consensus and avoiding late changes in the process? Are there any examples of good practice?*

- 4.42** The consensus is that it is too early to tell whether front loading is working although there is some evidence that (a) engagement is happening earlier, and (b) that there is a down side to the repetition of consultation and the necessity to engage regularly with the same document to little evident effect.
- 4.43** The National Planning Forum representative agrees that earlier and more open discussions can lead to consensus but considers it difficult to avoid late representations as "there will inevitably be changes affecting the plan through its preparation" but adds that the new system rightly seeks to ensure there is a cut-off point.
- 4.44** In contrast, the LGA's representative suggested that achieving consensus at an early stage is "an illusory concept that will not prove to be an effective means of reducing objections/late changes for most plans".
- 4.45** From the Planning Aid representative's point of view, "there is little differentiation between the approaches to the three stages of community involvement neither is there for different types of development document" and it would be sensible to distinguish between both the stages and the documents such that different techniques were applied as appropriate. It is also his view that "options documents should define the parameters for choice rather than present a draft." The RTPi representative concurs and points out that "different stages of plan production require different methods of involvement."

*(v) Capacity Building – Are you able to identify evidence of capacity building within the community as a result of the efforts of specific local planning authorities pursuing the new planning system or as a result of partnership working with others?*

- 4.46** There is little evidence of capacity building taking place although this is a long-term process and it is probably too early to judge. Planning Aid's representative believes that few authorities are addressing the issue. Both the Planning Aid and Friends of the Earth representatives doubt whether planners have the skills to undertake this task. As a consequence they believe hard-to-reach groups that do not understand planning are not being reached (Friends of the Earth). However, the National Planning Forum representative states that there is general evidence of capacity building in some of the early start local planning authorities being tracked by Planning Officers Society Enterprises. LGA's representative refers to Wycombe District Council's SCI as an example of local planning authorities pursuing the new planning system and capacity building through planning forums, community groups and weekly bulletins.

*(vi) Objectives – Are the objectives of your organisation being met through the new planning system? If not why not? Has your organisation changed its approach to engagement as a result of the new system? In which local authorities has this been most effective?*

- 4.47** The majority of responses suggested that it is too early to judge whether objectives are being met or indeed in some cases whether long-term changes of approach had occurred. Countryside Agency, English Nature and RSPB's representatives observed that they were focusing on earlier engagement in the process, although a common issue was the sheer quantity/complexity of the process making life more difficult. The Planning Aid representative warned that "there is a danger of a huge aggregate waste of public resources in this process," and expressed concerns about consultation fatigue.
- 4.48** There were few local planning authorities identified as being very effective at changing their approach to engagement but RSPB's representative pointed to a pilot Community Planning project in South East England that encourages local community groups to become actively involved in the planning process.
- 4.49** LGA's representative considers that the Association's members are committed to full engagement and recognises that some local planning authorities are more effective than others. The reason for this is believed to be the "paucity of resources as opposed to any ideological reason".

*(vii) Further Examples of Good Practice*

- 4.50** There were very few responses at all in this section. LGA's representative provided a contact at the Planning Officers Society. The National Planning Forum representative pointed out that Canada has a long history of community engagement and that lessons may be learnt from their coastal zone management.

**(iii) ROUND TABLE DISCUSSION**

- 4.51** To achieve a greater understanding of business's approach to stakeholder involvement a round table discussion was hosted by the Home Builders Federation (HBF) and attended by a small group of representatives from the Confederation of British Industry (CBI), English Partnerships, Persimmon, Berkeley Homes, Redrow Homes and HBF. The British Property Federation were also invited to send representatives but were unable to do so. The participants had been involved in some of the recent Regional Spatial Strategy examinations in public and the production of the first development plan documents including the examinations of Stafford and Lichfield Core Strategies.
- 4.52** The group agreed that there was a significant change in the planning system and that all representations and supporting evidence needed to be brought to bear at the earliest opportunity. In clarification it was explained that once an authority has undertaken its 'issues and options' consultation the direction of the document is set and once the 'preferred option' is put to consultation the authority is more or less committed to a strategy. Not all local planning authorities or stakeholders appear to be aware that there is no opportunity for an objector to promote an alternative beyond consultation on the 'preferred options' and of the implications of the new system in this respect.
- 4.53** The participants believed that, although Regional Spatial Strategies and core strategies were not in theory concerned with site-specific issues it was often the case that without site-based evidence strategy could not be realistically set. To a certain degree, a core strategy must take into account major development proposals; otherwise the strategy becomes idealistic and unrealistic. The need to front load evidence in both RSS and Core Strategies has meant that property developers need to submit details of their long-term aspirations earlier than in the old system. This has consequences for spending and cash flows which are not yet well understood by their managers.

- 4.54** There was an expression of dissatisfaction with the operation of the new system which, whilst intended to be more flexible, was felt to be less so in some respects. While in theory the core strategy should be produced first and other development plan documents follow, participants felt that there is a real benefit in producing all the main documents, including the allocations plan, at the same time. Some have suggested that there is a circularity in documents. For example, without considering allocations, and in particular housing allocations, it is difficult to be sure that the core strategy is feasible. However there needs to be agreement on the core strategy before the allocations can be made.
- 4.55** Overall the business sector is finding it particularly hard to engage with the new process. One of the main reasons is simply the scale of plan making with nearly 400 local planning authorities in England producing a number of new planning documents for which there are potentially three stages of participation plus an examination. Consequently, the CBI finds that when it comes to general business interests, aside from the property industry, there is little involvement among their members below regional strategy level.
- 4.56** Most house builders apart from the largest and most organised are reliant on the HBF and in any event at strategic and core strategy levels their interests are frequently competitive and in consequence they either do not make representations or combine to question overall growth numbers. They find it easier to become involved at a local level when they are able to support their own site interests. Small house builders find it extremely difficult to engage with the process as they do not benefit from the economies of scale which allow the volume house builders to engage.
- 4.57** This view contrasts strikingly with the view of local planning authorities expressed in the strategic survey (para 3.8) that they found it relatively easy to engage with developers. This can only be explained as a difference of perception. Local planning authorities may not know whether they have engaged with all the necessary developers until they have proceeded to later stages of the process and it may be that this is a view that will change over time.
- 4.58** There was a view that SCIs were not very useful documents and that subjecting them to a test of soundness by examination was pointless. Most present had read the earliest copies they had received diligently but once it became clear that they contained little valuable material and rarely considered the business sector as important, responding with anything more than a standard response was not seen as being a good use of their time. It was felt that most SCIs were unrealistic and tried to cover

all possibilities rather than recognising the local planning authorities' limitations and the varied needs of different contexts, stages in the process and different types of document.

- 4.59** One good example of engagement quoted was that of Vale of White Horse where genuine community involvement had taken place leading to significant alterations to a proposed housing development. It was agreed that the circumstances for good practice in community engagement varied so much that any standard advice on good practice was difficult to write and inevitably anodyne.
- 4.60** The involvement of local strategic partnerships is perceived to be a good thing generally but constitutes another level of involvement for businesses and their quality is variable. There was little experience of anything tangible emerging from sustainable community strategies. While business involvement in local strategic partnerships is a good example of wider business engagement there are others that question the representativeness of the partnership, which may not be acknowledged by all local groups.
- 4.61** House builders try to cover as many opportunities to engage as possible but concentrate on those areas where they have a site interest. The key question for the developer is "at what point will the decision be made?". In a situation where there is a hierarchy of plans, all of which will require community involvement as well as any subsequent application, a decision has to be made on priorities to avoid too much duplication. Participants agreed that their approach would be to attend events early in the process but to assess their value before making a long-term commitment. In the main businesses do not attend such consultation events.
- 4.62** In assessing the impact of the new system and whether participants were able to meet their organisations' needs it was agreed that the change to planning had been fundamental but not necessarily helpful to them. The new system would only be seen to be beneficial if the land identified early in the process coincided with their interest. It was suggested that an improvement in the process would occur if local planning authorities were to have a housing round table event early in the 'issues and options' stage. Some authorities, like Wokingham and Mid-Suffolk have undertaken a review of all potential sites at an early stage and applied criteria for their selection. This allows for a debate about the appropriate criteria at the examination without having to introduce new sites at a later stage. While there is inevitably conflict between developers in the process there are examples of joint working, such as in the London Plan, which have successfully reviewed overall levels of allocation. There were

doubts whether this can work so well at the LDF level which is more site specific, but even here, for example at Horley and Burgess Hill, consortia of developers have been successful at promoting sites.

- 4.63** The political dimension at the local level also adds complexity. The lack of consistency over time is a particular concern and there are already indications of decisions on core strategies being delayed by local planning authorities until after local elections. The participants were also concerned about the concentration of power of decision making in local authorities as a result of the increased power of portfolio holders in cabinets. Their view was that this meant that decisions were less exposed to a breadth of opinion and more likely to be seen as party political.
- 4.64** Participants were unsure about the cost implications to them of the new system and they did not necessarily budget in a way that made it easy to break down the additional costs of the new system. However, participants did report that promotion budgets have had to be increased to support the number of engagement opportunities – another cost that managing directors find difficult to understand and land owners are reluctant to bear.
- 4.65** The general view was that while there may be cases of consensus building leading to cost savings in the long run, eg Upton Northampton where an *Enquiry by Design* process built support for the urban extension proposal and reduced the potential for subsequent objections, compared with the old system, time-scales have been stretched and costs have been shifted to earlier in the process. One particular feature of the new system was the anticipated reduction in the use of barristers in public inquiries. While it is the case that fewer legal advisers are likely to appear at the examination, they are still central to advising at earlier points in the process and on the presentation of evidence.
- 4.66** Overall it is difficult to be certain whether the first impressions of the system are accurate and how much is down to teething-troubles on all sides. There were similar concerns on the introduction of the plan-led system in the early 1990s. However, there is little evidence that the new system is better for those who deliver development and infrastructure.

## Chapter 5: Analysis and conclusions

**5.1** In this chapter, the findings reported in Chapter 4 are analysed using the framework set out in Chapter 3:

- meeting procedural and statutory requirements
- broad approaches adopted including the innovative
- ensuring inclusiveness
- influencing the outcomes
- linking LDF engagement with other participatory processes
- front loading.

**5.2** Within this framework we also consider the key focus of this study, the involvement of hard-to-reach groups and the business community.

### Procedural requirements

**5.3** Stakeholder involvement is a core part of the new system and opportunities to engage are happening earlier. This is a view taken on all sides.

**5.4** However, the view that the time and effort required to produce and verify an SCI is not a good use of resources was echoed on all sides. While the usefulness of a document that sets out the approach to community involvement is recognised, a much simpler, locally-adopted document would suffice. What is missing from the process in most cases is proper budgeting for involvement and this should be an integral part of an SCI-type document. One way of getting better value for money from the process may be to use the expertise of Planning Aid (or other community-based organisations), not only at events but also in developing a strategy of community involvement.

**5.5** SCIs are commonly too long, and use impenetrable language. Whilst there are some rare exceptions to this criticism, stakeholders often find it difficult to understand the new planning system and how they can get engaged in it, undermining the purpose of SCIs. Local planning authorities ought to focus on producing SCIs for stakeholders rather than primarily regarding them as a milestone within LDF production.

**5.6** Very few SCIs differentiate between the approaches to the three stages of community involvement. Different stages of plan production require different methods of involvement. However, it may not be possible to determine particular methods for different stages and documents, as this would undermine the flexibility of selecting the most appropriate method

for continuously evolving documents, circumstances and stakeholders. The success of engagement could be measured by the number of responses received during public consultation. However, at the ‘preferred options’ stage, local planning authorities could focus a substantial part of their resources on dialogue with small groups of people who are likely to represent a wide range of interests. This echoes the findings of the Preparing Core Strategies report<sup>9</sup> which suggested more appropriate methods of engagement should be used to encourage dialogue at the ‘preferred options’ stage of the process.

- 5.7** Speed of LDF production is a concern for stakeholders, although ironically the necessity to produce SCIs is seen as one of the reasons for delay. More fundamentally, developers find that for them timescales have been stretched because of the necessity to engage earlier in the process. An interesting dimension to the issue of balancing speed and inclusivity is the view that each stage of involvement and different types of development plan documents should be addressed differently according to their needs, rather than being treated in the same way.
- 5.8** These findings support the proposal by Communities and Local Government to change the SCI’s status from a document on which public involvement is required and which is subject to the tests of soundness, to a document that is required but should be produced and adopted by the local planning authority, for the following reasons:
- only few stakeholders take the opportunity to engage in the process of SCI production and objections from private individuals are often not of direct relevance to the document. Individual members of the public have also been known to use an examination to voice unrelated issues, thereby wasting PINS’ time
  - regarding the tests of soundness, the SCI section dealing with resources is generally weak and it is difficult for PINS to advise local planning authorities on the budgeting of resources for community engagement
  - PINS can highlight regulatory problems and can decide that a SCI should be withdrawn and redrafted to improve its readability and clarity. However, local planning authorities should be able to detect these weaknesses for themselves. Consultation with the local strategic partnership would support the consideration of different stakeholder interests in the SCI.

<sup>9</sup> Baker Associates et al. (2006). *Thematic Study 2: Preparing Core Strategies*.

## Approaches

- 5.9** There is considerable scepticism that new attitudes to involvement are emerging despite the commitment to new techniques reported in SCIs. However, there are clearly some local planning authorities that are genuinely rethinking the needs of stakeholders, and the ways in which their involvement can be facilitated, including the greater use of ICT. The development of new techniques, such as *Enquiry by Design*, has enabled more participative involvement for organised groups.
- 5.10** A principal concern of the LGA's representative was that stakeholder involvement was not being pursued sufficiently rigorously because of a paucity of resources allocated to it. In addition, there is concern that if stakeholder involvement is not managed sufficiently well, there could be a considerable aggregate waste of resources from all active parties. In particular, stakeholders that need to budget their limited resources carefully cannot afford to be drawn into unnecessary and duplicative engagement.
- 5.11** The necessary culture change on behalf of local planning authorities does not seem to have occurred, or at least become sufficiently significant in shifting the emphasis to a more inclusive approach to plan making. One reason for this is the unsatisfactory nature of many sustainable community strategies, in that they fail to embrace a consensual strategic approach which the core strategy is able to operationalise. Likewise, planning departments may have made little effort to work more closely with local strategic partnerships and community planning to achieve an integrated approach. Future guidance on SCI ought to cover community planning and sustainable community strategies. More generally, there is little evidence that local authorities have fully recognised the degree to which a step change in attitudes and approaches to stakeholder and community involvement is needed if the progress envisaged in the planning reforms is to be realised.
- 5.12** New approaches to involvement should increase response rates and motivate individuals to turn up to events or interact via the Internet. Innovative consultation methods ought to be tailored to contact hard-to-reach groups and give stakeholders the opportunity to discuss, interact with, and to a certain extent influence, the plan-making process.

## Inclusiveness

- 5.13** While the new system is designed to be as inclusive as possible it is still the case that certain groups are at a disadvantage in achieving engagement and that some who are crucial to the implementation of plans, like small

house builders, find it difficult to engage on the local planning authority's terms.

- 5.14** In general the complexity and technical language of the new system is a considerable barrier to involvement of non-experts. There is little evidence of reskilling or training of either planners or stakeholders being central to SCI, and the concept of capacity building among relevant communities is poorly developed.
- 5.15** The need to front load the process is an added burden to developers which does not fit their business model, added to which the proliferation of planning documents fragments their ability to become involved. However, the potential consequences of little engagement from developers would be that planning applications are refused and that alternative strategies cannot be promoted once the preferred option of the core strategy is put to consultation.

#### Outcomes

- 5.16** While concerns about decisions being predetermined have been rare, there is a view that the three stages of involvement in development plan document production soon narrow down to limited choices. Indeed some local planning authorities take the view that significant alternatives to the chosen strategy may be arrived at only by quite artificial means, producing apparently unreal choices posed to stakeholders. However, in the main, the major strategic choices will already have been made at a strategic level, with choices on thresholds and percentages of affordable housing to be made locally through consultation.
- 5.17** Similarly the balancing of conflicting views utilising both the breadth and depth of participation was not evident in this study. In other words how the outputs of involvement are to be utilised to shape policy etc is rarely explicit. However, it may be that that is more related to day-to-day practice of stakeholder events rather than at the design level on which this paper focuses.

#### Linkages

- 5.18** Because, to the lay person, the separation of the function of spatial planning from other aspects of local government activity is a theoretical rather than a real distinction, the multiplicity of consultation and participation activities is at best confusing and at worst frustrating because of the apparent repetition and lack of progress. There is a seeming circularity and overabundance of different documents for them to comment on, before significant decisions are made. As a consequence

there is a real danger of consultation fatigue. This is effectively avoided only where local planning authorities have engaged in joint working through, for example, the local strategic partnership.

- 5.19** Where there is joining up of participation on strategies, stakeholder involvement is reported to be more effective. Engagement utilising groups established by local strategic partnerships or other voluntary bodies can provide an effective long-term approach which is less confusing to the participant.
- 5.20** There was little evidence of the means by which local planning authorities are more broadly linking their stakeholder involvement to the democratic processes except where SCIs propose the use of parish councils as building blocks of participation. Few links between SCIs and sustainable community strategies were found. The reason for this may be that at the time of SCI production, the authors were still focused on land use planning and followed guidance on SCIs, set out in PPS12, which does not mention community planning. However, in their SCIs, local planning authorities propose to utilise local strategic partnership databases to identify and contact groups of stakeholders.

#### Impact on hard-to-reach groups and the business community

- 5.21** It appears from the evidence of the SCIs that the bodies with which local planning authorities seek to engage have changed little, and that both hard-to-reach groups and businesses are rarely identified in those terms. Few SCIs attempt to define what they consider to be a hard-to-reach group or how they might be reached. Generally these sections are considered weak by PINS.
- 5.22** The fact that there are very few good examples of ways in which local planning authorities propose to involve hard-to-reach groups indicates that, despite the intentions of the Act and associated guidance, there has not been much of a change in thought or approach to community and stakeholder involvement within authorities; that resources are not available or are not being prioritised to fund the investigation of new approaches to stakeholder involvement; or, if this is not the case, the resources are being consumed on ill-considered and ineffective approaches.
- 5.23** It is possible that hard-to-reach groups will benefit from some of the newer, more inclusive approaches to community engagement being introduced by some local planning authorities, but the techniques are rarely justified in these terms. More specifically, the failure to highlight capacity building in SCIs and subsequent participatory activity means that there is limited likelihood of the new system improving on previous approaches.

- 5.24** In addition to feeling excluded from recognition by SCIs, business interests often find themselves heavily outnumbered at participatory events. While in terms of democratic representativeness this is understandable, when it comes to discussing issues of implementation and deliverability, businesses and especially developers and house builders are in a very good position to advise. What is required are separate stakeholder events to consider these kinds of issues, and some authorities do take this approach.
- 5.25** Businesses find the sheer quantity of engagement opportunities difficult to respond to. When nearly 400 local planning authorities in England are producing a number of development plan documents and related documents, each of which has three potential stages of involvement, the mathematics speak for themselves. Add to this the local strategic partnership and other non-planning commitments it is little wonder that the business community chooses to be selective in its approach.

#### Front loading

- 5.26** A related matter concerns the front loading of participation which in turn has had an impact on the cash flows and budgeting of developers. They now need to put more money into promotion of sites although it is too soon to tell whether this means that there will be subsequent savings down the line. And equally the time-scales between investment on sites and a return have been stretched, which has an impact on borrowing requirements and profitability. While this is an area that requires greater research it is an experience that mirrors that of Regional Spatial Strategy involvement where house builders and developers have had to be involved in a far greater level of detail than had previously been the case for Regional Planning Guidance production. It is perhaps understandable that PINS finds the majority of development industry representations to be negative in nature.

## Chapter 6: Key lessons and recommendations

- 6.1** Drawing on the findings and conclusions from this thematic study, key lessons and recommendations are put forward for different groups of participants in the process of stakeholder involvement: local planning authorities, stakeholders, and Communities and Local Government.
- 6.2** Key lessons and recommendations for local planning authorities are to:
- place sufficient emphasis on stakeholder and community involvement in the LDF process. Although there appears to be widespread acceptance of its importance in principle, and local authorities have embraced new procedural requirements such as the preparation of SCIs, there needs to be more of a realisation by local authorities that this aspect of the LDF process is still not being fully delivered in the ways envisaged by the planning reforms and that, to do this properly, requires a cultural change in working practices and a step change upwards from previous experiences and approaches
  - utilise SCIs as accessible documents that communicate intentions to stakeholders and the public. The SCI not only needs to set out clearly who should be involved, when, and for what purposes as well as considering the range of approaches and methods that might be appropriate, but also be a means of engagement with such bodies
  - develop an appropriate strategy for participation that considers using different participatory approaches at different stages of involvement, and for different types of development plan document
  - ensure that the strategy is supported by an appropriate budget and is developed and assessed against value for money criteria
  - monitor the success (or otherwise) of community engagement in the annual monitoring report (AMR), analysing whether particular groups or communities, such as hard-to-reach groups and the local business community, are being engaged and, if not, consider whether there are alternative ways that this might be better achieved
  - partner other organisations engaged in community involvement such as the local strategic partnerships and parish councils, in order to draw on a wider range of skills and expertise in facilitating community and stakeholder involvement, avoid participation fatigue and duplication, and produce a more informative response
  - clarify their understanding of hard-to-reach groups in their locality, and devise strategies and techniques that address their concerns

- ensure that business/developer interests are properly recognised and special arrangements made to engage them in consideration of opportunities and deliverability. One specific step would be to invite extensive site identification early in the process, even for core strategies, to enable an explicit criteria based approach to strategy and site selection to take place
- recognise that the LDF teams are not likely to possess all the required skills and do not have to act alone. Instead they should look to draw on experience elsewhere in the authority and utilise organisations like Planning Aid and other community-based organisations and charities that are well qualified to provide advice and support for stakeholder engagement
- consider ways of building greater capacity for communities to engage and what purpose this might serve. Almost certainly this will include training and skills development of both local authority officers and stakeholders.

**6.3** Key lessons and recommendations for stakeholders are to:

- ensure early engagement in development plan preparation and provide as much information up front as they are able
- be prepared to alter working practices in terms of allocating more resources to front-end activities such as site promotion and interactive engagement, and ensuring that members, managing directors and landowners are fully aware of the implications of change in the system
- engage with local strategic partnerships to make them relevant and to ensure that they work in partnership with local planning authorities

**6.4** Key lessons and recommendations for Communities and Local Government are to:

- consider altering the status of SCI from a document on which public involvement is required and which is subject to the tests of soundness, to a document that is required but should be produced and adopted by the local planning authority in consultation with the local strategic partnership
- consider ways of encouraging local authorities to allocate appropriate levels of resources to stakeholder involvement in comparison with other areas of planning activity

- disseminate the lessons learned from this study and other practice studies and consider the need for the preparation of further explicit guidance on the identification of hard-to-reach groups, dealing with the interests of business and the development industry, and on different approaches to stakeholder involvement that may be appropriate at different stages of different DPDs.

## References

Baker Associates, Terence O'Rourke, Universities of Manchester, Liverpool and the West of England (2006) *Lessons report 1: Making timely progress and the integration of policy*, London: Communities and Local Government.

Baker Associates, Terence O'Rourke, Universities of Manchester, Liverpool and the West of England (2006) *Thematic Study 2: Preparing Core Strategies*, London: Communities and Local Government.

Baker Associates, Terence O'Rourke, Universities of Manchester, Liverpool and the West of England (2007) *Lessons report 2: Using evidence in spatial planning*, London: Communities and Local Government.

Baker, M., Coaffee J., and Sherriff G. (2006) *Literature Review 3: Achieving Successful Participation*, London: Communities and Local Government.

Carroll, A.B. (1996) *Business and Society: Ethics and Stakeholder Management* (3rd Ed) (Southwestern Cincinnati) p74. Cited in: Baker, M., Coaffee J., and Sherriff G. (2006) *Literature Review 3: Achieving Successful Participation*, Communities and Local Government.

Communities and Local Government (2006) *Strong and prosperous communities, The Local Government White Paper*, London: The Stationery Office.

Leach, S. and Wingfield, M. (1999) *Public Participation and the Democratic Renewal Agenda: Prioritisation or Marginalisation?* Local Government Studies, vol. 25(4), pp. 46-59. Cited in: Baker, M., Coaffee J., and Sherriff G. (2006) *Literature Review 3: Achieving Successful Participation*, London: Communities and Local Government.

ODPM (2004a) *Planning Policy Statement 12: Local Development Frameworks*, London: The Stationary Office.

ODPM (2004b) *The Egan Review: Skills for Sustainable Communities*, ODPM: London. Cited in: Shaw, D., (2006) *Literature Review 2: Culture Change and Planning*, London: Communities and Local Government.

ODPM (2005) *Spatial Plans in Practice: Bulletin 1*, Electronic Copy Only: ODPM.

ODPM (2006) *Spatial Plans in Practice: Supporting the reform of local planning – Inception Report*. London: ODPM.

Rozee, L. (2006) *Meeting the Challenges of the New Local Development Framework System*. Journal of Planning & Environment Law, Occasional Papers No.34, Cornwall: Sweet & Maxwell and contributors.

Shaw, D. (2006) *Literature Review 2: Culture Change and Planning*, London: Communities and Local Government.

## Annex 1: Stakeholder questionnaire

**Terence O'Rourke**

### **THEMATIC STUDY 3 – STAKEHOLDER INVOLVEMENT JULY 2006**

#### **Instructions:**

1. Please answer as many questions as possible
2. Please type in the grey boxes provided
3. When complete, please save the document to your computer as a **new** file and attach to a return email to: emily.kress@torltd.co.uk. Thank you for your time and trouble in responding to these questions.

#### **Objectives of the New System**

In responding to the following questions can you illustrate your answer with examples of good practice and/or examples of ways in which some groups are being disadvantaged in their ability to participate.

#### **ACCESS**

The new system is designed to allow for fair access and opportunity to participate for all members of the community. Do you feel your members are able to access the process readily and can you give examples of where successful approaches have been adopted?

#### **SCI**

Have you any evidence that SCIs are changing stakeholders' understanding of planning issues and that they are being used for this purpose? Equally is there evidence that the production of SCIs is changing the thinking of planners about the practice of engagement?

### Methods of Involvement

Methods of community involvement should be fit for purpose in that they allow stakeholders and other interested parties to participate at the appropriate stage. What specific methods being used by which authorities would you point to? Are these enabling participation at the appropriate stage?

### Front loading

Is there any evidence of front loading in the preparation of DPDs and that facilitating early involvement is working? Will it, in your opinion, succeed in achieving consensus and avoiding late changes in the process? Examples of good practice?

### Capacity Building

Are you able to identify evidence of capacity building within the community as a result of the efforts of specific LOCAL PLANNING AUTHORITIES pursuing the new planning system or as a result of partnership working with others?

### Objectives

Are the objectives of your organisation being met through the new planning system? If not why not? Has your organisation changed its approach to engagement as a result of the new system? In which local authorities has this been most effective?

### Further Examples of Good Practice

Has your organisation noted any examples of unique or innovative methods in community involvement (other than those already referred to) being undertaken as part of the new planning system? If so where and what is the basis for your judgement?

Has your organisation encountered any approaches to community involvement in other fields of activity or other countries that you feel would be beneficial to the LDF system? If so where and why?

Are there further contacts with individuals or organisations that you believe it would be beneficial for the research team to make to further assist in this study?

## Annex 2: Agenda for stakeholder round table

### **Spatial Plans in Practice – Local Development Frameworks and the experience of the business sector. A round table discussion.**

#### **A meeting of representatives from HBF plus invited guests from CBI, EP and BPF.**

Venue – Byron House, 7 St James's Street, SW1A 1DW

10.30 to 12.30 on Wednesday September 6th 2006

Host – Andrew Whitaker (HBF)

#### **AGENDA**

**Introduction** – Jim Claydon (Terence O'Rourke) on the background and findings of research into the new planning system.

#### **Discussion Topics**

- Is the new planning system easy to access by key stakeholders?
- Has the production of Statements of Community Involvement improved your ability to engage in planning processes?
- Engagement in plan making is intended to start earlier in the process than before. Has this been beneficial?
- Does the new planning system enable you to meet the objectives of your organisation more easily than before?
- Are there particularly good or bad examples of practice that you can point to?
- Can you provide any indication of the costs of engagement in plan preparation?