

Response ID ANON-5BBE-JSS3-1

Submitted to Effective community engagement in local development planning guidance: consultation
Submitted on 2023-09-13 10:30:05

Purpose and scope

1 Do you agree that the purpose and scope of the guidance is clear?

No

Please comment on your answer (particularly if you do not agree):

In our view, neither the scope or the guidance are clear or detailed enough. It should be clearly stated that the guidance is aimed at planning departments and that the purpose of the guidance is about engaging communities meaningfully in local development plans.

We also believe the guidance should be more ambitious, bringing in the impact assessments referred to later on, and prioritizing equality, inequality and human rights.

Whilst the focus of this guidance is on planners, we think that separate guidance should be written for communities so they know their roles, rights and responsibilities. This would need to be written in plain English, and be accessible and engaging. Currently, the language of the document is unlikely to mean much to anyone who isn't already familiar with planning and community engagement.

However, and to return to our first point, the current guidance will benefit planners and communities alike if it's purpose is set out in as straightforward and clear a manner as possible. In our experience, many professionals and practitioners are themselves unfamiliar with community engagement, and many are likely to be new to the legislation. Therefore, the scope and purpose, as well as the guidance document as a whole, should be written without presuming prior knowledge of planning and community engagement.

Finally, we would support the use of more examples of what community engagement in local development plans looks like in practice. This will help to clarify what the guidance is about and what should be aimed at. It should also mitigate against inconsistent application of the guidance.

Levels of engagement

2 Do you agree that the terms inform, consult, involve, collaborate and empower, as described in the table, are helpful terms to support understanding of different levels of engagement and the influence that results from it?

Yes

Please comment on your answer (particularly if you do not agree):

We welcome the clarity regarding the difference between consultation and more meaningful forms of participation. However, we can see that some more far reaching statements, such as the framing of empowerment as placing decision-making in the hands of participants, is undermined by the statement that all levels of engagement are a form of empowerment for communities. Many initiatives termed empowerment do not involve such a power shift, and the guidance should acknowledge that community engagement all too often stops short at consultation and information provision. It would be more accurate to say that there are 'empowering elements' to all the listed approaches, whilst highlighting that some forms of participation are more empowering than others.

We would also like to see the guidance recognise its own limitations, in the sense that, however meaningful and participative community engagement is in local development planning, this is still a top-down process. The parameters and timescales, as well as decision-making power, are in the hands of planners. People who are active in their communities around planning issues will often be seeking action and influence. Honesty and transparency about what power communities have in this regard should help to manage expectations of all involved, and foster better relationships in the longer term.

Stage by stage engagement

3 Do you agree that the appropriate levels of engagement have been identified for the stages of local development plan preparation?

No

Please comment on your answer (particularly if you do not agree):

Whilst we welcome the linking of the 3 stages of the LDP process (evidence gathering, plan preparation, delivery) with the IAP2 (The International Association for Public Participation) model, we are concerned that the stage-by-stage section is very light and unambitious.

We would prefer to see a lot more detail on the purpose of engagement in each stage and more on the possible methods which could be used. As the guidance states, it would be unwise to prescribe methods for different stages as these will depend on the different audiences, but there are general points that could and should be made about the kinds of methods that would be useful at different levels of engagement, with different audiences, and for various purposes. Those engaging with communities should be encouraged to reach for the higher levels of engagement – involve, collaborate and empower.

Part 2 on 'Inviting Communities to prepare a LPP' is particularly weak. Despite identifying this stage as one which empowers communities, this is limited to the ability to make a plan, with no mention of support or how the LPP will be taken on board by the LDP.

Development planning needs to go much further than 'informing' community bodies about the assistance that may be available to them. In part 3, we note that evidence reports must describe the assistance provided to groups to develop LPPs. Part 2 should therefore say more about how that support should be provided.

Local authorities and other statutory planners are in a position to offer direct support to groups. This is an opportunity for those working in planning departments to work closely with community learning and development (CLD) colleagues as well as any other departments and staff working to support communities. Planners should also be encouraged to work in partnership with other local and national organisations who can offer support to communities.

In addition to those sources of support listed, such as the Our Place website, the guidance should link to other information and guidance that could help communities. For instance, Planning Democracy, the Town Toolkit, Planning Aid Scotland, Argyll and Bute Council's Community-led Action Planning Toolkit and SCDC's Knowledge is Power toolkit would all potentially be useful resources to signpost to.

In terms of implementation, the guidance should set out how LPP priorities and actions should be taken on board and integrated into the LDP. This could potentially be framed as having 'due regard' for LPPs with a clear explanation of what this means. The value of LPPs in enabling communities to collaboratively identify priorities and how to take these forward should be recognised in the guidance. It should be stated clearly that inviting communities to develop LPPs without integrating them into LDPs is likely to disempower communities rather than empower them.

Where planners have good reason not to include aspects of LPPs in LDPs, they should be advised to meet with the community organisation(s) who developed the LPP to discuss the best way forward. In most cases, community organisations and planners will ultimately have shared outcomes they seek to improve. This is an opportunity to explain any reasonable grounds why a particular course of action cannot be followed and to discuss alternatives.

Although our focus is mainly on part 2, we would like to see more ambition in how the guidance sets out the other stages of engagement. For instance, part 5 on preparing the LDP, part 6 on consultation and part 7 on modifying the LDP should go beyond information provision and consultation and promote innovative, pro-active engagement

We would also like to see the guidance emphasise the importance of pro-actively seeking existing community plans, including community-led action plans, locality plans, and any other reports and less formal material produced, or contributed to, by community groups. Planners should be encouraged to focus on establishing the priorities of marginalised and disadvantaged communities who, in addition to being worst affected by poor planning, are in less of a position to be able to develop LPPs.

In particular, we would welcome an acknowledgement of the position of community-led action plans in contributing to the LDP, whether this is separately from LPPs or incorporated within them. We argue for these linkages to be made with full parity of esteem for communities in LDPs, particularly, but not only, where there is an LPP in place.

Not every priority will be framed or expressed in terms of spatial or development planning. However, those developing an LDP should be able to recognise spatial elements and also be able to make connections between LDPs and priorities. It shouldn't be left to communities to fit their priorities with, and adopt the terminology and language of, spatial planning. If there is any uncertainty over how community priorities fit with planning considerations, this should again be an opportunity to meet and discuss how best to accommodate different perspectives.

Finally, we would like to see more on planning and evaluating engagement. This should include setting out how those involved in designing the engagement process set outcomes for the engagement process and how they will know that this has been achieved. Other considerations that need to be planned for carefully include:

- How to make engagement more straightforward, accessible and appealing.
- Ensuring there are adequate capacity, resources and skills to carry out an effective engagement process.
- How colleagues in different departments and organisations will be involved, helping to reach into the community, for instance CLD teams, third sector partners etc.
- How evidence will be gathered to show that engagement has been successful, such as numbers of people contacted, range of methods used and feedback from participants.
- How communication and feedback will be carried out, and how this will be made accessible for all groups.

Tools such as VOICE are useful for planning and evaluating engagement in this way and should be referred to in the guidance.

4 Do you agree that the appropriate levels of engagement have been identified for the impact assessments?

No

Please comment on your answer (particularly if you do not agree):

The summary table is useful as an overview with a good range of impact assessments. However, we would prefer to see more guidance on when different impact assessments should be carried out and how community stakeholders should be involved, both in the screening process and in any impact assessments which are conducted.

We are also concerned that engagement carried out in line with the draft guidance could end up being tokenistic. Planners need to be guided in respect to meaningfully and sensitively engaging with lived experience and to go beyond community organisations that they are used to engaging with, e.g. community councils.

Further consultation questions

5 Overall, is the approach set out in the guidance helpful?

No

Please comment on your answer (Particularly if you do not think the approach is helpful):

As we have gone into in more detail above, we currently find the guidance to be unclear in terms of purpose and lacking ambition in terms of promoting pro-active, meaningful community engagement in local development plans.

In its current draft, we are not confident that the guidance and the approach it takes will make much difference to community engagement in planning. There is an opportunity to overhaul how engagement around planning is done – e.g. using innovative approaches which support informed deliberation and a proper power shift towards communities worst impacted by poor planning.

Innovative approaches which could be incorporated into the guidance include citizen's assemblies, mini publics, lived-experience panels and grassroots activism so that the very way in which planning is done, from the beginning, is based on the priorities of people in all communities and, in particular, those likely to be affected worst by poor planning (who are usually most disadvantaged and marginalised communities).

In addition, we recommend that the approach of the guidance embodies the following considerations:

- That shaping LDPs is seen as a dynamic and ongoing process, not only something that happens during the official consultation timetable for local LDPs and then much less so for the subsequent five years.
- That guidance on the LDP framework puts as much onus as possible to proactively engaging all sections of communities early in a dialogue about issues and solutions.
- The 'background' section of the document (beginning on p3) could be more inspiring, recognising the crucial role planning has in addressing key challenges such as inequality and climate change. This section could clearly state that meaningful democracy and citizen participation is required in order to begin to address these properly.
- There are welcome paragraphs on equality and human rights and recognition of barriers faced by groups with protected characteristics. We believe the guidance should build on this by highlighting why these groups need to be involved – i.e. that their views are essential in order to achieve better outcomes for all. They are likely to be worst affected by poor planning, and will have key insights on what is needed in order to make planning more effective, fair and sustainable.
- Giving proper recognition to the role of community development support. Too often, CD is tied in with other specialities and not valued and supported in its own right.
- The need to avoid forcing communities to complete another plan on top of the many local planning requirements that already exist, from locality planning to health and social care. Communities can't decide the timelines on LDPs because they are statutory, and the lifetime of the LDP means that more transient communities may feel voiceless as they won't engage in plans with a long shelf life when they don't feel connected. This again highlights the importance of proactively engaging communities where they are at, including using existing plans and priorities where these have been identified.

In terms of structuring the guidance, we recommend that the Scottish Government either:

- Modifies and expands the IAP2 table to give much more detail on purpose and methods. This could then help to beef up the stage-by-stage sections

or

- Uses the National Standards for Community Engagement as the basis for the stage-by-stage section which would help to structure the guidance and ensure it covers the following in appropriate detail.
 - Inclusion and accessibility
 - Support and community capacity building
 - Collaboration (planning and working together)
 - Methods/communication
 - The purpose (impact) of community engagement in the LDP

6 Do you have any views about the initial conclusions of the impact assessments that accompany and inform this guidance?

Yes

Please comment on your answer (particularly if you do have views to share):

We note that the initial impact assessments are positive about the impact the guidance will have. This reinforces our view that the guidance is strong in terms of considerations of equality and human rights and the barriers faced by different groups. However, we would caution against taking the positive impacts to mean that the guidance is likely to effect a real power shift, or meaningful participation in planning, which will require taking a different approach as outlined in our response to q5.

7 Thinking about the potential impacts of the guidance – will these help to advance equality of opportunity, eliminate unlawful discrimination, and foster good community relations, in particular for people with protected characteristics?

No

Please comment on your answer.:

Again, we think a meaningful and bottom-up approach, with appropriate support in place, is required, and that this should be made clear in the scope and purpose of the guidance.

In our responses to previous questions we have covered the support that needs to be in place for communities. In addition, training for all partners is essential to ensure that local development planning enables meaningful engagement and empowerment.

If statutory partners wish to really advance equality, tackle discrimination and support the participation of marginalised and disadvantaged communities, they need to be supported to believe and trust in communities. This is a significant cultural change in some areas. The guidance has a role to play, both in terms of setting a standard for how ambitious we should be, but also in terms of emphasising the importance of resourcing training in meaningful participation and the value of this.

8 Do you have evidence that can further inform the impact assessments that accompany this guidance, in particular in relation to the impact of the guidance on people with protected characteristics, businesses and costs to businesses?

Yes

upload file:

No file uploaded

Please comment on your answer. :

We would like to highlight the successful outcomes (in terms of lived-experience contributing to policy) achieved by All In For Change, the approach to tackling homelessness in Scotland, led by Homeless Network Scotland, Cyrenians and Scottish Community Development Centre (SCDC). This programme put lived experience at the heart of system change by supporting a 'Change Team' of frontline workers and people with lived experience of homelessness to effect policy change.

The Change Team has directly influenced a number of significant policy developments, including:

- Being part of the Prevention Duty Review Group via the Prevention Commission (particularly the 'Ask and Act' element of this)
- The Homelessness and Rough Sleeping Action Group recommendations, including policy around rapid rehousing and Housing Youth First.
- The ending of the Local Connections policy

Supporting meaningful 'co-production' with people lived-experience has been shown to have the following outcomes:

- Strengthening evidence-based policy and directly improving homeless services
- Contributing to a policy-shift towards prevention
- Helping 'bridge the gap' between policy and lived experience of homelessness, including through 'sense-checking' policy as well as generating unique insights and ideas.
- Promoting wider participation, engagement and co-production within the public sector.
- Positive benefits for participants in terms of increasing skills and confidence.

See more at: <https://www.scdc.org.uk/news/article/2019/12/10/all-in-for-change-launch?rq=homeless>

9 Please provide any further comments on the guidance set out in this consultation.

Please provide your comments here.:

About you

10 What is your name?

Name:

Andrew Paterson

11 What is your email address?

Email:

andrew@scdc.org.uk

12 Are you responding as an individual or an organisation?

Organisation

13 What is your organisation?

Organisation:

Scottish Community Development Centre

14 The Scottish Government would like your permission to publish your consultation response. Please indicate your publishing preference:

Publish response with name

15 We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this consultation exercise?

Yes

16 I confirm that I have read the privacy policy and consent to the data I provide being used as set out in the policy.

I consent

Evaluation

17 Please help us improve our consultations by answering the questions below. (Responses to the evaluation will not be published.)

Matrix 1 - How satisfied were you with this consultation?:

Very satisfied

Please enter comments here.:

Matrix 1 - How would you rate your satisfaction with using this platform (Citizen Space) to respond to this consultation?:

Slightly satisfied

Please enter comments here.: