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FULL REPORT

THE VALUE OF ENGAGEMENT IN PLANNING IN WALES

PREPARED BY

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With funding from Welsh Government

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Introduction

What is the purpose of this research?

This research sets out to explore and demonstrate the value of engagement in the working of planning in Wales, with the goal of proposing a path to embedding best-practice engagement in the Welsh planning system.

We prioritise recommendations focusing on a series of practical, actionable measures.

Alongside this, the research aims to provide a view on the longer-term structural and political changes required to achieve cultural change in this area, at what is a crucial political junction for Wales. With increasing recognition of the value of placemaking, working with communities at all stages of the planning process takes centre stage in the agenda for change in planning. Place-planning – defined as a coherent and continuous process aimed at appropriately involving citizens at all stages of decision making related to land and its uses - needs to go hand in hand with the Place-making agenda.

Who is it for?

This research is intended to be of use to Welsh Government in guiding future planning related activity, as well as to Local Planning Authorities (LPAs) and communities in Wales. It is hoped that the report will be used to increase awareness of the value of engagement and act as a catalyst to recognising meaningful engagement practice. Meaningful engagement practice is defined as an engagement activity that adds value to the planning and development process by harvesting knowledge that cannot be otherwise accessed and fostering community cohesion through a conversation that is consistent and extends in time (in respect to decisions affecting the same land over time) and space (across specific allocations and also beyond LPAs' boundaries). This report aims to kickstart a programme to join-up, update and improve the provisions, tools and procedures currently available.

How will the findings be shared?

The findings of this research will be shared in two ways:

- 1) A set of recommendations that can inform the potential for future work by the Welsh Government about engagement in the planning system. These will comprise both long- and short-term suggestions (see Chapter 4).
- 2) A set of resources for Local Planning Authorities and other stakeholders, to both reinforce their understanding of the importance of engagement, and to demonstrate its value to local communities as well as communities of interest in Wales (our case studies, in Chapter 3).

The Research Design

This exploratory research marries existing knowledge and practice, as embodied in academic and professional literature, with fieldwork based on established mixed methodology including:

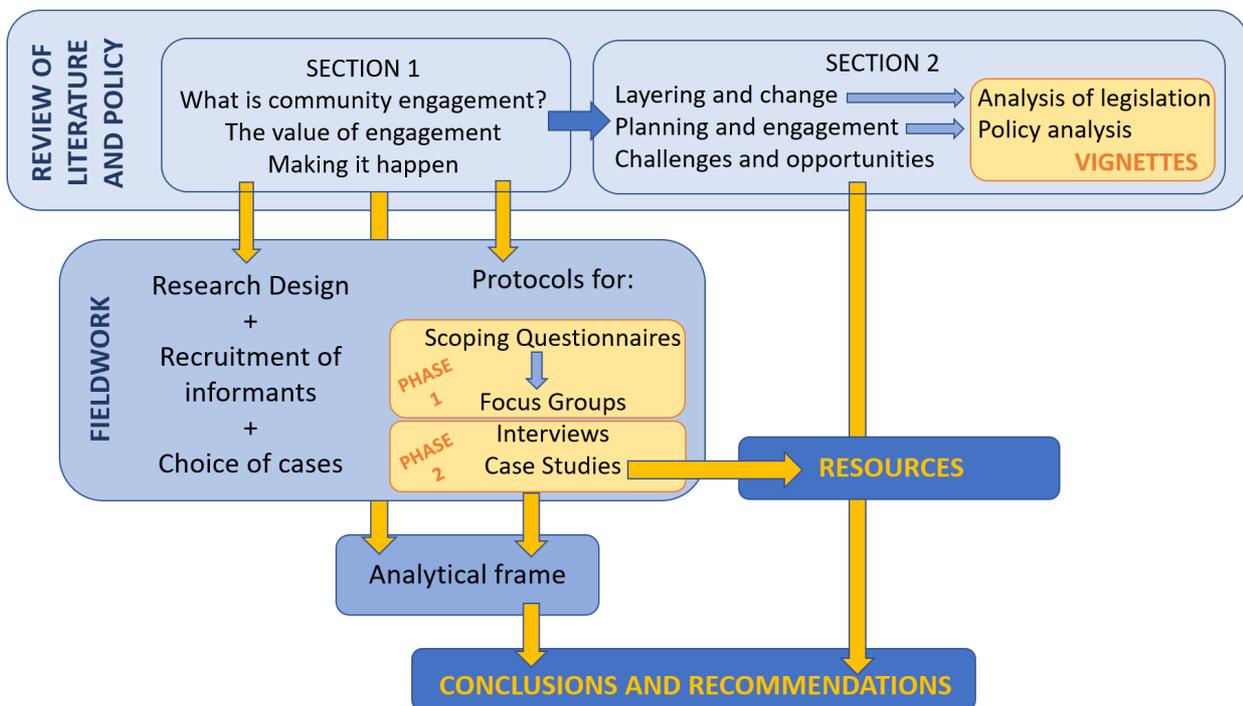
- Exploratory survey, bearing a discrete sample (95 respondents) broadly representative of the variety of stakeholders active in the planning in Wales.
- Focus group comprising 21 informants.
- One-to-one interviews (with 15 selected informants) to integrate first-hand experiences in engagement processes around Wales.
- A set of 6 Welsh case studies.

Data gathered is analysed using themes identified through existing literature and an analysis of the relevant policy, to distil the principles shaping the recommendations.

The Structure of this Report

The structure of the report mirrors the research approach we followed. A short review of literature, policy and practice opens the report, to set the scene and enable the research to draw from existing knowledge. The research data is then presented in order of collection, followed by its analysis and interpretation. This analysis then feeds into conclusions and recommendations. A set of Resources aimed at LPAs and communities, is provided by the case studies analysed in Chapter 3.

Figure 1: Report structure



Chapter 1: Review of Literature, Legislation & Policy

The purpose of this chapter is to fully contextualise the issues around engagement practice in Wales. The chapter is divided into two sections:

- 1) A summary of the established knowledge in the research area as developed over the past 50 years. Given the depth and breadth of existing research, the section is deliberately selective and focuses on material likely to push forward thinking on the subject area in Wales.
- 2) An interrogation of the legislative and policy context of the Welsh planning system and the challenges and opportunities it currently faces, following the unique path the country has taken since devolution.

Outcomes of both parts fed into structuring the fieldwork, the analysis of case studies and the final conclusions and recommendations.

Section 1: What does the literature say about engagement?

Background

- A SCOPUS search returned almost 500,000 papers published worldwide on engagement in planning. The work is near saturated with a wide selection of case studies that, perhaps surprisingly, very commonly lead towards similar arguments, conclusions and recommendations. Very few papers have been published in relation to planning in Wales.
- These studies are typically focused on episodes of engagement and are often value-based and aspirational (judging engagement practice on the basis of what participants want it to be about, or on what planning 'should' be about) or focused on questions of compliance (e.g. did the system 'work', i.e. do what it was supposed to do). They rarely place cases within specific socio-economic and legal settings and time is rarely actively used in analysis.
- It appears that no official comprehensive review of participation and engagement practices has been conducted in the UK since their introduction as statutory requirement in 1969. This is remarkable considering the scrutiny planning has consistently undergone in the period and increasingly so in the past twenty years.

This work, commissioned by Welsh Government, constitutes a first attempt at analysing engagement practices in Wales ('what is the value of engagement?') and goes further than existing literature by exploring the social and political value engagement in planning carries in a devolved administration strongly characterised by the shape and use of its land and by the close connection of administrative structures with its people (what is engagement valuable for?). In an attempt to shift attention around engagement towards its direct and indirect outcomes, it proposes the definition of 'meaningful engagement' as an engagement activity that adds value to the planning and development process. Meaningful engagement could be used as both a guide value to devise 'fitting' engagement processes and as a benchmark to assess engagement.

This section opens the report by exploring several questions around the origins and nature of engagement in the planning systems in the UK.

Participation and engagement – main emerging themes from academic literature

Few research areas have been trodden as much as participation and engagement in planning. The literature is varied, wide in terms of geographical reach and focus but there are some clearly emerging themes repeatedly addressed.

In what is mostly a body of literature normative in content, the first theme covers issues of accessibility and clarity as desirable features in engagement. The value of engagement can be difficult to ascertain and is judged differently by the different actors in the planning system. Terminology is interchangeable and ill-defined. Clarity in terminology and processes can go a long way in supporting good engagement so shared understanding of the outcomes of engagement is necessary. This theme covers the need for consistent use of plain and accessible language, for clear and consistent policy and guidance to be issued and frequently updated, for widely shared best practice and for the development of appropriate methods to promote and encourage effective participation of a variety of different individuals and groups.

Clarity and accessibility of engagement processes tie closely to equity and equal access to engagement, a theme which pivots on the fact that the achievement of equal access in planning might translate in practice in the adoption of variable geometries in the use of resources: the more hard-to-reach groups requiring more effort, time and dedication to be effectively involved than other groups. In order to achieve equal access, costs are to be considered, as are creative approaches and having a good knowledge of the local planning environment to make the most of, and build on, existing networks.

Another theme is that – whilst efforts to rationalize the development process tends to compartmentalise various phases – citizens have a perception of their direct environments that is linked to their past history and their daily lives. The gaze of residents and of communities on their places is one of continuity, where processes around uses and change affecting land are seen in a continuum rather than a phase. Because of this, in order to be effective, engagement ought to be seen by planning too as a joined-up continuous process, where various (planning and development) phases are connected, link and to an extent overlap in a localised ongoing conversation between residents, government and the development industry.

A theme extensively covered by academic literature over time is that of the political value of engagement, often an aspiration frustrated in practice by engagement being subsumed within technical requirements in an array of procedures. This is particularly evident in the UK, where decision making is conducted in two phases (plan-making and development control) in which roles are clearly allocated to elected members and officers. Engagement is currently viewed as a merely technical process hindering potentially added value created by closer relations between representative democracy and direct representation. Certainty is an overarching theme under which much planning research can be placed. In respect to engagement specifically, certainty is valued in respect to process as certainty of process (clarity of goals and reach, specific timeframe, transparency of process, etc.) acts as a guarantee for the development industry, as an incentive for communities and individuals to engage and is in itself a positive feature for LPAs to foster trust. Transparency in decision making and accountability of outcomes constitutes a final relevant theme, which has value in respect to specific developments but finds its own role in the long-term development of trust and respect amongst stakeholders in localities.

What is engagement?

Terms such as *'consultation'*, *'engagement'* and *'involvement'* abound in much of the literature and, in many cases, are used almost interchangeably (along with *'collaborative'*, *'deliberative'* and *'dialogue'*). Uncertainty about the terms *'community'* and *'stakeholder'* also abounds in the literature.

The casual and apparently interchangeable use of all such terms is found most commonly in practical guidance and everyday practice usage by all parties – planning officers, councillors, developers and local people - in both plans and project proposals, but it is also apparent in much academic literature.

No widely agreed definitions – shared amongst all stakeholders - yet exist for any of the terms but a level of agreement has emerged in recent years amongst regular practitioners of engagement, both generally and in relation to aspects of planning.

An emerging set of definitions suggests various components to practice exist as follows:

- **Informing:** Letting people know that a plan or project is on its way, that key stages may have been reached or that a final version has been agreed. Though this does not offer any opportunity for communities/stakeholders to contribute, it provides the necessary information to be able to do so at the most appropriate time. Classic methods are websites, newsletters, PR work and, today, social media.
- **Consulting:** All key decisions are made by the plan/project initiator but opportunities are provided for communities/stakeholders to comment, contribute, question at specific times and/or on specific aspects during the plan/project preparation. Classic methods include surveys, questionnaires, public meetings.
- **Involving:** Although all key decisions are still made by the plan/project initiator, there may be some stages in plan/project preparation where communities/stakeholders have a genuine opportunity to discuss and develop ideas, or such opportunities are provided on particular aspects. Classic methods include focus groups, drop-in events, workshops, ad hoc citizens' panels.
- **Engaging:** Plans/projects, or aspects of them, are developed almost in partnership with communities/stakeholders, with full opportunities for anybody to challenge, develop, suggest, evaluate and ideally agree the outcomes. Classic methods include working groups and consensus processes but, centrally, face-to-face work with all parties created as equals – hence the terms *'deliberative'* and *'dialogue'*.

These levels do not necessarily have value implications; all may be needed and appropriate for some or all involved at some or all stages of planning and development management and as such this set has potential to be more widely shared and be more formally embedded in Welsh practice.

As for the ambiguity in respect to the terms *'community'* and *'stakeholder'*, this report will use *'community of place'*, *'community of interest'* and *'stakeholder'*.

- **Community of place:** One definition of community states that *it 'usually refers to those living within a small, loosely defined geographical area'* and who could therefore be directly affected by a plan or project. That *'community of place'* suggests that it is the

place – a central theme for planning – that binds together people with potentially very varied interests and values.

- **Community of interest:** Another definition matches a community with a '*community of interest*', whereby it can be '*any group of individuals who share interests*'.
- **Stakeholders:** '*Stakeholders*' loosely relates to both these definitions of community as well as including any other individual or associations of individuals with a 'stake' in a plan or project even if they may not live in the plan or project's area or have a specific material interest in them. It can affect them directly or indirectly, or be another party not affected by a plan or project but who can influence it, for example, Natural Resources Wales or a developer.

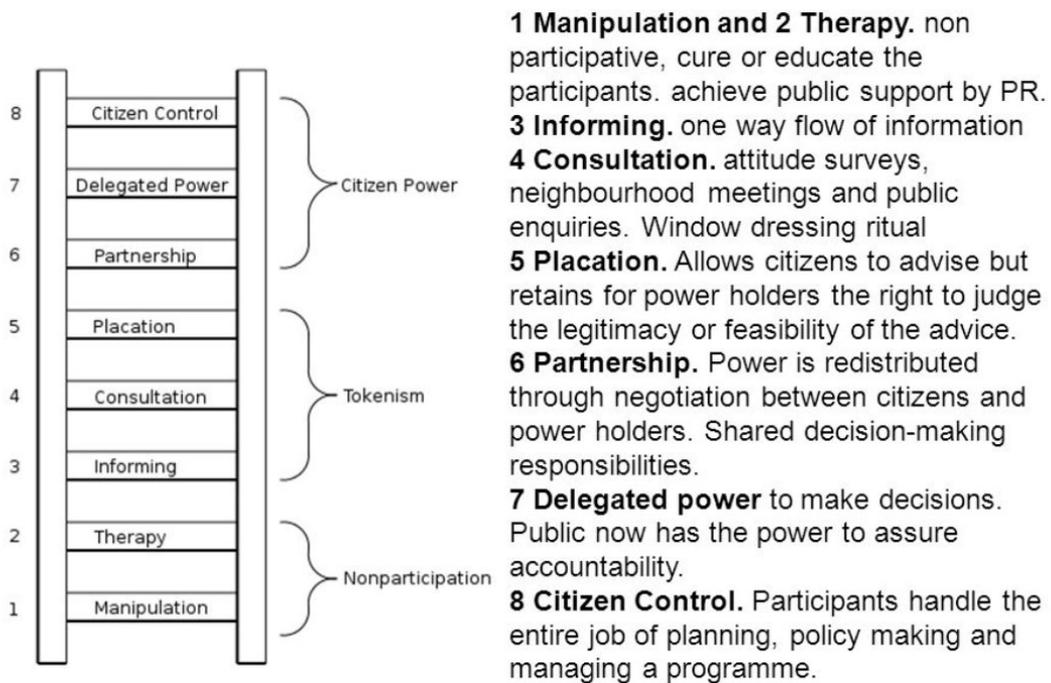
With the slightly different definitions of 'local community', 'community of interest' and 'stakeholder' as outlined above, it then becomes possible to see how and why different levels of engagement may be appropriate for each group at different stages.

What are the origins of engagement in planning?

Current approaches to engagement in planning can be traceable to the way planning systems have developed over time across the UK:

- Public participation in planning was first envisioned by *The Franks Report* as a means to balance (and possibly limit), the role of public interest with private property rights¹. Openness, fairness, and impartiality could not be reasonably restricted to landowners only and opened the way to engaging the general public.
- *The Skeffington Report* (1969) introduced the requirement for public participation as statutory and made planning the first sector of public service to introduce the need to engage with the public².
- From the late 60s onwards, the popular and widely cited Arnstein's *Ladder of Participation* (1969) offered some structure as to what was originally understood as engagement at the time of its first introduction in the UK, by defining a hierarchy that ranges from manipulation through to citizen control in community development³. This approach, as indeed the term 'participation' has fallen out of favour in the UK particularly in recent years, possibly because of its limitations in respect to applications to the planning field.

Figure 3: A ladder of citizen participation, Arnstein (1969)



<http://lithgow-schmidt.dk/sherry-arnstein/ladder-of-citizen-participation.html>

- In the following decades studies (e.g. McAuslan, 1980) suggested that the planning system in the UK results from three competing ideologies, layered over time:
 - the need to protect private property and businesses and its institutions;
 - the push to advance the public interest; and,
 - the pursuit of furthering the cause of public participation.

Each of these align to specific actors in the development process: Government, the development industry and the general public. Unresolved tension between these three ideologies could be the system-embedded cause of much disillusionment in planning to this day⁴.

Where is the value in engagement, and how is it measured?

A recent study quantified costs of engagement to developers of mainly larger projects in Scotland in a range from £20k-100k, depending on the scale of the project and the type and duration of engagement activities. A typical pre-application consultation was found to cost around 0.3% of the gross development value on residential applications.⁵

Beyond this rare and specific monetary quantification, value is addressed from numerous angles. Academic literature gives indications of what the value of engagement might be; what is understood as ‘value’ varies by sector according to the individuals and groups involved and the local engagement culture that has developed over time in specific contexts:

Figure 4: Value and challenges of engagement



For Government, value is linked to accounting for the needs of the communities they represent in decision making and delivering public trust in the process. Views are often split, but generally, planning officers can see how good engagement builds understanding and makes procedures smoother. The need for more resources to enable positive engagement is well documented⁶ and value is strongly associated with cost. Performance metrics focus on efficiency, which can negatively affect work satisfaction, creative ability and the quality of development and public spaces.⁷

The development industry is opening up to engagement, where value means certainty and speed of outcomes. There is recognition that using engagement to shape projects can make the process less bumpy and more predictable in terms of costs and outcomes, but not in respect to time. However, developers are sceptical where it is not clear how outcomes of engagement will affect the development process:

‘there was also real disquiet among developers about the use of judicial review by communities against proposals which, although in accordance with planning policy and/or consented through planning applications, could be ‘endlessly’ held up by technical legal arguments’ (Raynsford report, TCPA. 2018:57-58).

For the public, the value of engagement lies mainly in its potential to provide clarity of process and certainty in outcomes of the planning system. Public attitudes towards development change for the better when they are involved in co-producing visions for the future⁸. However, the public lack of trust in Local Planning Authorities, developers and landowners is deep and wide-ranging.⁹ The Raynsford report suggests that:

‘Rebuilding trust in planning among all the sectors is a vital objective for future planning reform, with multiple benefits for everyone’ (TCPA, 2018:58)

The critical core value to the public is the opportunity to play a part in making real choices via direct democratic engagement.¹⁰

One feature all actors’ views seem to align to is around what makes engagement meaningful for them: a positive feature that ‘adds value’ to either planning and development processes (e.g. fostering trust and understanding between stakeholders; providing additional knowledge through collaboration, etc.), or the physical outputs thereof (e.g. quality of developments and additional services provided, etc.), or both.

A current movement within planning has recently emerged to re-align how value is assessed beyond monetary quantifications; it will likely play an important part in measuring the value of engagement activities going forward:

- The Royal Town Planning Institute (RPTI)’s *Measuring What Matters* report sets out a framework for monitoring and evaluating the outputs and impacts of projects in terms of wider social, economic and environmental value. This builds on the ‘*Measuring what matters*’ tool produced in Wales as ‘*a simple and practical tool for anyone undertaking evaluation*’.¹¹
- Recent guidance entitled *Delivering Social Value: Measurement* produced by the UK Green Building Council (UKGBC) also sets out a framework for defining and delivering social value in built environment projects. Importantly, this guidance identifies public engagement itself as key in defining and delivering social value.¹²

What principles encourage positive outcomes in engagement?

Over the past 50 years reports have repeatedly set out principles as to how the public should be engaged in the planning process, building on and developing those originally introduced in 1969. There is a remarkable level of consistency between what the many authors put forward as key principles.

Following an analysis of numerous professional reports, guidance and literature, the key principles to facilitating effective engagement can be distilled as follows:

- i). A **clear process** should be established at the outset, which is agreed between stakeholders, but designed and managed with demonstrable independence.
- ii). The scope of the engagement should be established at the outset to **manage expectations** of outcomes.
- iii). Engagement should **start as early** as possible in the planning process (well before development management).
- iv). **Building trust** between stakeholders is essential and should be established through openness and honesty.
- v). There should be a **mutual exchange** of knowledge and learning between stakeholders.
- vi). A **common base** of information accessible to all stakeholders should be established.
- vii). A **variety of engagement methods** should be considered, appropriate to the specific project and engaged groups and people, with a view to maximising inclusion.
- viii). **Clear feedback** to communities and stakeholders should be an ongoing process.
- ix). The process should be recorded and reported, in a way that facilitates **transparency, meaningful evaluation** and that **enables tracing of engagement** from visioning through to plan making, development management and masterplanning.

What are the barriers to effective engagement?

The causes of a lack of trust, negative attitudes and low participation in the planning system can be summarised as:

- i). A lack of **public awareness** around how they can get involved with the planning process, particularly within more socially disadvantaged communities¹³.
- ii). **Public apathy** resulting from a perception that '*consultation did not lead to any real tangible change for the better*'.¹⁵, which can be perpetuated by no or inadequate feedback.
- iii). A **negative public bias** in the perception of what statutory engagement is for, particularly for specific planning applications where the public's ability to object isn't accompanied by the ability to propose alternatives.¹⁴
- iv). There is a **technical process bias** in the perceptions of engagement at the expense of political and democratic opportunity.¹⁵
- v). In England, successive reforms have fragmented the planning process in terms of time, scale and issue. This makes for **disjointed, narrow and limited engagement practice**, often focusing on the local scale. The Welsh context is explored in this report.
- vi). **Negative elected member perception** can leave councillors feeling intimidated by engagement in respect to specific decisions who can then limit their involvement in

such activities. Members are described as ‘often invisible and lacking leadership’¹⁶, particularly when issues are controversial.

- vii). As outlined above, too many terms within the realm of **engagement would benefit from further clarification** and are used and misused interchangeably. This could cause a lack of focus in understanding and clarity in implementation right from the start and creates opportunity for misunderstanding and misinterpretation – which in turn might prepare the path to a lack of trust.

How does engagement practice vary in the other UK jurisdictions?

Legislation & Policy

England

The 2004 Planning Act in England, and its associated guidance, brought in a formal requirement for engagement guided through Statements of Community Involvement (SCI). These were to be produced by Local Planning Authorities as part of their overall Local Development Framework. Typical SCIs outline who the authority intends to involve (or engage), how they intend to involve people and when to do so. That applied mostly to statutory plans, but all SCIs also included a short section on involvement in planning applications. Some more elaborate SCIs included a large amount of detail on the aspects above and some also included involvement principles.

In terms of plans, there is a requirement to submit a Statement of Consultation (note the change of term) alongside a plan for its examination. Some Statements have been no longer than two pages because almost no engagement was undertaken, but others have been thorough and detailed. No plan or application has ever been turned down on the basis of even the most minimal engagement, mainly because there were no clear standards against which to assess the engagement work, partly because authorities argued a lack of resources to do more, but also because Planning Inspectors may not have the right guidelines, capacity or training to evaluate engagement.

The Bristol City Council SCI¹⁷ is one of the more demanding and thorough, including in relation to planning applications. Such an SCI, enables officers to press applicants to meet their list of standards and, although there is no legal requirement to do so, research has shown the advantages of speed, certainty and equality for the development industry, government and the public when the standards are met.

The Localism Act (2011) promised a step up in terms of engagement in planning by making pre-application engagement a formal requirement, but the associated secondary legislation was never passed. In response to this, and the positive experience of authorities such as Bristol, a number of authorities have been pressing to introduce what are termed Pre-Application Community Involvement Protocols. One authority (Stroud) produced a Protocol collaboratively with development industry representatives, planning officers, councillors and Parish/Town Council representatives. It was included in their first Local Plan as a policy. Although it is still not possible for an application to be refused on the basis that the Protocol was not followed, it appears to have helped to shift applicants towards better engagement practice.

The Localism Act also introduced Neighbourhood Plans across England. These are produced primarily by local communities in Parish/Town Council areas, although the day-to-day planning work is expected to be undertaken by some form of Steering Group semi-independent of the local council (and such groups often employ consultants to assist). In un-parished urban areas, a 'Forum' has to be created and formally approved by the local authority to lead on Neighbourhood Plans. Neighbourhood Plans have to go through a number of formal, legal stages including examination and then a local referendum in the plan area before they are 'made', at which point they have the same status as the Local Plan. Notably, Community Protocols as described previously have also been introduced into a number of Neighbourhood Plans.

The legislation requires any Neighbourhood Plan to be a 'shared vision' and, in comparison to the experience with Local Plans, several have been challenged on that basis by examiners and even by residents who felt excluded. In a few cases, submitted plans have been turned down because of inadequate engagement. In general – and perhaps because of the small numbers of people involved and the access to grant aid – the preparation of Neighbourhood Plans is based on more, more diverse and more influential engagement than Local Plans. At the same time, they raise important questions about local democracy (local authority councillors may not be involved at all) and research has suggested that they are far more likely to be undertaken by wealthier and more articulate communities in towns and villages towards the south of England – those who most commonly contribute to engagement practice. Though evidence is limited, in some instances, Neighbourhood Plans appear to have been successful in resisting challenge by developers, and the status of their 'shared visions' has occasionally been used by Inspectors in order to dismiss appeals.

This more active role for the public has been welcomed by observers and used in many areas¹⁸ and outcomes have been found to add value for multiple stakeholders.¹⁹ However, the system is perceived to be cumbersome. It can create additional rather than alternative levels of democratic accountability, and uptake tends to favour areas which have the time, expertise and community structures in place to prepare them. Uptake has been much lower in urban areas and northern regions of England.²⁰ Focus on the local also obscures more strategic decision-making that remain distant from communities' reach, attracting criticism of populism for the English approach.

Scotland

Public engagement has taken centre-stage in three interrelated areas in Scotland: planning reform, land reform and community empowerment²¹, which focus on rebuilding trust with communities. The Scottish Government places emphasis on enabling communities to have '*meaningful and positive influence in future developments in their area.*'²², and public views are sought at all levels. Local Development Plans must be prepared also with the specific involvement of children and young people. Notably, the Scottish Government have published a Planning Advice Note on community engagement.²³

Representative democratic accountability and decision-making is provided at all levels, with regional plans the outcome of planning authorities (each with its elected representatives) working together. There are also clear directions to guide the work of planning inspectors in respect to public involvement in Scotland: Inspectors must assess the process in respect to representations received and pass the matter back to the Ministers if there is evidence of

unresolved representations²⁴. This allows effective integration of direct democracy with traditional structures of decision making based on representative democracy, achieving a concerted and comprehensive effort in joining up different legislative areas with engagement at the forefront²⁵.

Northern Ireland

In April 2015, a new plan-led system decentralised many planning functions to eleven new local councils. The new Local Development Plan system requires strong links to each Council's Community Plan and the roles of elected members and planners have changed as a result of decentralisation, requiring focused strategy-setting and accountability at a local level.²⁶ The first round of draft Local Development Plans began to tentatively emerge in 2019.

The effect of political deadlock and consequent delays to the formation of the fifth Northern Ireland Executive on engagement practice is unclear, but a new *Planning Engagement Partnership* has now been established by the NI Department of Infrastructure (and other stakeholders) to act as a forum to share experience, good practice and learning. A key role of the Partnership will be to explore opportunities to 'enhance the quality and depth of engagement practice' at all levels.²⁷ The directions the PEP will take are unclear at present and current post-Brexit tensions may risk further slowing progress in this as many other policy areas in Northern Ireland.

Tools, Methods & Approaches

Common methods

Whilst there are an enormous variety of engagement tools, methods and approaches available (145 listed by only one organisation²⁸), engagement bound by statutory process tends to be still reliant on a small number of common methods: written consultations / surveys, stakeholder workshops and exhibitions / 'drop-in' style public events, irrespective of the type of audience and stage the engagement is carried at. This area in particular might be a relevant one for Welsh Government to act upon in the medium term by drawing from the literature and providing detailed agreed options amongst all stakeholders – and relative guidance – as to what methods might be more appropriately adopted at which stages.

Digital Engagement

Recently there has been a proliferation of digital tools that facilitate an engagement, emerging from both commercial and academic settings. Estimates of the number of platforms available range from 113-450²⁹. These tools range widely in their application, geographic availability and the type of engagement that they facilitate. Only a quarter of these platforms are estimated to have potential to facilitate effective co-production between the government and the public.²⁹

A report by Grayling Engage and the RTPI (2020) echoes much of the literature in its recommendations for increased use of digital engagement platforms.³⁰ As the use of digital tools in engagement develops, it will be important to carry these principles forward alongside the more general principles for effective engagement identified earlier. In particular, care should be taken to avoid digital tools replacing face-to-face engagement, despite the

perceived convenience that they offer. In Wales, specific concerted thought will have to go in where, how and at what stages to introduce more active use of digital tools in planning as Wales is one of the regions most affected by the 'digital divide' - with 42% of the population affected by difficult access or exclusion due to either social deprivation, location or a mixture of both (Good Things Foundation, 2020 Digital Nation 2020 Report) – a phenomenon vastly increased due to austerity and, more recently, COVID.

Guidance & Training

There is no shortage of guides on engagement practice: Some are about engagement generally, not just within planning. For example, *'The Facilitator's Guide to Participatory Decision-making'*³¹ and *'Planning under Pressure'*.³² Some are specific to planning but only about certain aspects such as plan-making. For example, *'Good Practice Guide to Public Engagement'*³³ and *'Effective Involvement and the Local Development Framework'*³⁴.

Some tend to focus heavily on methods, more applicable to projects (despite good method choice and use being just one of the overall principles listed above). For example, *'The Community Planning Handbook'*³⁵ and *'English Partnership's Approach to Engagement'*.

Some have government backing, for example *'Making Plans'* and the suite of guidance produced following the 2004 Planning Act in England. At least one – *'The Craft of Collaborative Planning'*³⁶ – has professional institute support, in this case from the RTPI.

As of now, only one appears to have been agreed by the industry as a whole - the *'Ten Commitments for Effective Pre-application Engagement'*³⁷, which was produced collaboratively by the British Property Federation, the Home Builders Federation, the Federation of Master Builders, the Local Government Association, The RTPI, the Planning Advisory Service, the Planning Officers Society and Locality. However, it is, as its name implies, solely about development projects, not plan-making.

While there is almost too much guidance on engagement, and guidance alone will not change practice, there has always been very little training on engagement. A national training programme for planners, councillors and community representatives was briefly run in England following the 2004 Planning Act. A few further courses followed for planning authority members. Planning Aid Wales (and to a lesser extent Planning Aid England) have run training for planners and Community Councillors. It does not appear that any training has been provided for developers, although planning consultants acting for them have sometimes attended events in England.

It is difficult to imagine how real progress can be made without some agreed multi-sector guidance followed up by a Wales-wide training programmes, addressing both engagement in (broadly speaking) plan-making and engagement in development projects as a continuum.

To be noted is the role increasingly performed by PR agencies in the planning field which produce very informative events and material, but the meaningfulness of the engagement undertaken has yet to be independently evaluated. More research ought to be done in respect to these companies' work and their effect on building trust in planning in Wales.

The impact of austerity

Public sector cuts have impacted on all aspects of planning services across the UK in terms of both resources and skills, as well as on the private sector development system. This has had knock-on consequences for the public and often resulted in less and less significant opportunities for engagement, continuation of meeting minimum requirements and overall contributed to a less responsive environment.

This effect is exacerbated in areas of deprivation (often with higher population densities), areas with poor service provision and areas where there is low interest from the development industry. This trend could easily continue and worsen due to COVID-19 and Brexit if funding were to be further reduced in Wales.

In conclusion, current academic and grey literature analysed in the previous sections suggests:

- There is no agreed definition of what engagement is, however there is an emerging agreement amongst engagement practitioners that it is a practice aimed at including – to various degrees – citizens and communities in decision making related to land and its uses that entails various components (informing, consulting, involving, engaging) to be adopted in various ways at different stages of the planning and development process. This practice is based on accepted principles, is structured around a set of accepted tools and approaches, and its effective adoption is currently limited by specific barriers;
- there are six relevant themes from which engagement ought to be looked at and evaluated:
 - T1 – Clarity and accessibility
 - T2 – Engagement as a continuous process
 - T3 – Engagement as both a technical and a political moment
 - T4 – Transparency in decision-making and accountability of outcomes
 - T5 – Certainty of process
 - T6 – Costs and equity
- Engagement in planning is valued. Despite different actors valuing it for different reasons, most actors appreciate meaningful engagement when the engagement process is seen to add (rather than detract) value to either planning and development processes, or outcomes, or both;
- developing a consistent approach to engagement as a feature that adds value to planning processes might provide an opportunity for Wales to strengthen its Place-making agenda.

Section 2: How is engagement approached in Wales? Law and policy development

This section explores value in relation to what systemic features might lead to dissatisfaction with engagement in planning and seeks answers to a key question: Is the context provided by the planning system conducive to meaningful engagement?

It does so by (i) presenting theories of institutional change and current policy developments in Wales and (ii) navigating the system in place from an 'engagement' angle and exemplifying its vocabulary through its practical use in two desk-based exploratory sketches.

The planning system in Wales: layering and change.

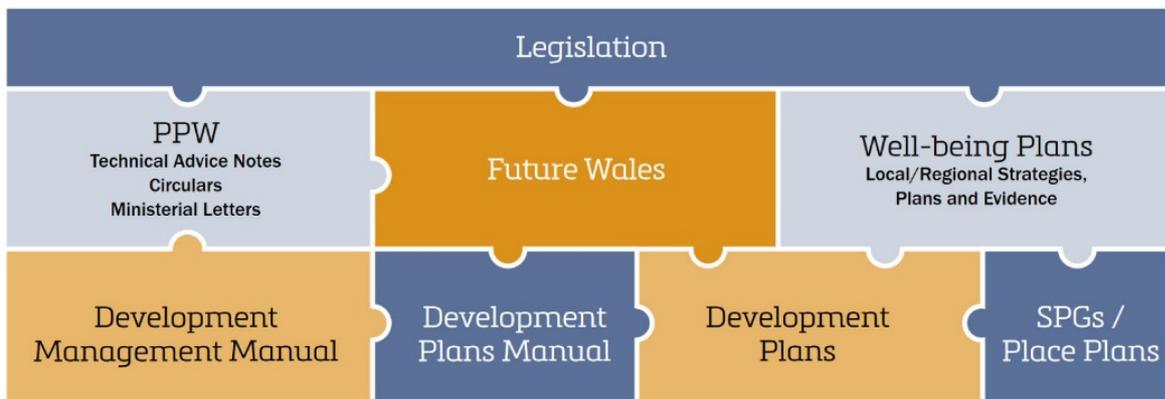
With some exceptions³⁸, planning is now almost entirely devolved to Wales. Legislative backdrop is set by the courts, notably Judicial Review, and appeals are directed to the Planning Inspectorate, which will become an independent Welsh service in 2021.

The planning system in Wales is the result of layering of subsequent provisions making what is in place today an assemblage of legislative material produced both before and after devolution (*see table appendix B*) aligned to the priority of sustainable development Wales has been a trendsetter for in the UK.

So far, Wales has not followed England in the adoption of innovative but potentially populist planning reforms (e.g. Neighbourhood Plans) and has kept a watchful eye on the more radical moves made in Scotland. However, there has been steady pursuit of a distinctive approach to planning that makes the most of Wales’ resources and people by following thorough evidence-based processes. The resultant framework for planning in Wales is summarised in the diagram below (the figure does not show the role of the Planning Inspectorate in deciding appeals and the Welsh Ministers’ adjudicating role).

Figure 5: The planning system in Wales

Figure 1: The Planning Framework



Source: *Planning Policy Wales, Edition 11.*

Planning systems anywhere are ever-developing entities and often the result of subsequent changes to the rules guiding land development over time³⁹. Change is a consequence of layering, conversion, drift and displacement of policy, and actual outcomes are at times as much deliberate as unintended⁴⁰.

In planning generally, decisions are based on policy or precedents – so the system is designed to reinforce the status quo and support certainty, but it is also sensitive to interpretations and contextual changes.⁴¹ Time is an important dimension in Institutions settling and the shift to an agenda focusing on places and place making is an ideal opportunity to strengthen and prepare for the future as a focus on place privileges quality, citizen-driven, users-led outcomes as much as processes. A review of relevant legislation in Wales (Table 4, appendix) reveals careful drafting that has produced a coherent body in respect to the central aspects of the planning system.

But how has engagement been considered? Is there clarity in respect to definitions of 'community', 'stakeholder' and 'engagement'? Has joining-up been considered for the engagement taking place at different stages of the development process? The following sections provide an account of how engagement features within the Welsh planning system through a review of provisions in policy and two exploratory analysis vignettes; one focusing on the practical use of terminology and the other on the level of connection between different episodes of engagement practice affecting one area over time.

How is engagement accommodated in planning policy in Wales?

An analysis of the Welsh planning system reveals the opportunities and constraints for engagement as embodied within Welsh planning policy⁴². The findings are summarised as follows:

- The primary statutory mechanisms through which the public are invited to engage are through (a) public consultation periods on Local Development Plans and (b) commenting on planning applications.
- There is a lack of coherence between different engagement activities, as well as a lack of publicly available or accessible feedback or reporting on previous engagement activities.
- Pre-application consultation (i.e. early engagement related to (b) above with no links to LDP consultation, i.e. (a) above) occurs as a set moment in time, 28 days before an application is submitted. It is as yet unclear whether any meaningful changes to development take place as a result. This may reinforce the perception of engagement activities as a technical requirement, which constrains their potential. Whilst beyond the scope of this research, a further systematic review of such exercises, changes made and pre-application consultation reports may be warranted.
- The public are given opportunities to be consulted but have no substantial powers in shaping development, which is broadly led by decisions made by elected members.
- Decision-making in planning seems to inherently pitch representative (delegated) democracy against opportunities for participative (deliberative) democracy in the form of public engagement.
- The power of property rights creates an environment in which it is difficult for the public to advocate for and enact change.
- Community and Town Councils have very limited role or influence over planning matters and are constrained by capacity and the necessary planning skills. Whilst Place Plans allow an opportunity for communities to be involved in co-producing planning policy, could be spatially-focused and local. Crucially, they can become Supplementary Planning Guidance yet there is no discrete funding available to prepare them and the community skills needed are limited. This may explain the current slow take-up, but further exploration of potential barriers is warranted.
- Community Involvement Schemes and associated Deposit Plan consultation reports are part of the policy preparation process but may present missed opportunities to deliver meaningful engagement activities (explored further below).

Does the planning system in Wales facilitate clear and consistent engagement?

This section presents two exploratory exercises that further illustrate the position of engagement in the Welsh planning system:

- 1) An exploration of whether the Welsh Planning system goes beyond the uncertainty in the use of the terminology around engagement established in Section 1 by analysing words used in a sample of key documents; and
- 2) Following findings from the section above, we follow how engagement has been seen, treated and conducted in one locality, following it through time, from the Community Involvement Scheme through a Local Development Plan to planning application.

Is terminology clear?

An analysis of how often and, perhaps more importantly, in what way the terms ‘*Consultation*’, ‘*Participation*’, ‘*Stakeholder*’, ‘*Engagement*’ and ‘*Involvement*’ were used within a sample of planning documents at all levels of the planning system is presented below (see appendix for full list of documents reviewed):

Table 1: Frequency of word usage across a sample of planning documents

Document Type	Frequency of word usage (no. of instances)					
	‘Consultation’	‘Participation’	‘Stakeholder’	‘Community’	‘Engagement’	‘Involvement’
Legislation	43	4	0	6	0	0
National Policy	183	9	53	287	11	27
Planning Manuals	0	4	80	103	6	71
Local Development Plans	93	3	34	538	10	17
LDP Sustainability Appraisals	182	17	22	525	15	23
LDP Inspector Reports	40	0	6	101	5	7
Planning Applications	10	0	0	13	0	0
Planning Appeals ⁷⁸	0	1	0	24	0	0
PINS Guidance	17	1	1	3	2	3

As outlined in Section 1, engagement terminology is often not clearly defined, and some terms are used interchangeably with similarities and differences often implied more than explained at different levels within the planning system. For example, the *Development Plans Manual* suggests that '3.5 A key message is one of involvement rather than consultation.', but does not describe how involvement be considered, judged, improved within the process.

Whilst it is recognised that the Welsh Government's role is not to be prescriptive to Local Planning Authorities on the precise ways they should involve their communities, clearer indications as to how *involvement* differs from *consultation* and exemplifications of how statements of intent can be shaped into actual commitments may be beneficial, either through guidance or future iterations of such guidance.

It is possible that a lack of clarity and interchangeable use of terminology at different levels of the planning system may have some influence over perceptions of engagement activity as a technical step in the process akin to many others (e.g. validation); it is a function that needs to be performed but there is little to show that its content, process and outcomes constitute a focus or will be judged within the system. Moreover, consistency of use is not detectable locally and less so across administrative boundaries. Looking at engagement solely as a technical task frustrates the potential positives of its political value.

As only of exploratory value, no final conclusions can be drawn from vignettes, but the brief presentation above suggests that further work teasing out use, meaning and understanding of terminology linked to engagement appears advisable.

Is engagement joined and consistently pursued throughout the planning process?

This second vignette maps how engagement is embedded within policy and supporting documents through the policy making process in one Local Planning Authority in Wales, from the Community Involvement Scheme through to the decision on the Inspector's report on a Local Development Plan. It then looks as to whether and how these principles worked their way through to the development management process.

The Community Involvement Scheme (CIS)

- This clearly sets out what it is and who should be consulted. It seeks to '*employ effective involvement processes*' and recognises '*that one method does not suit all*'. Engagement methods listed include exhibitions, flyers and information on websites. Little detail is provided of innovative approaches or general principles for delivering innovative approaches to achieve more meaningful engagement, and there is no detail on other methods to engage youth groups or hard to reach groups.
- The CIS clearly states that '*The LDP process includes clear stages for feeding back to the community*'. This is positive, referring to reports being available online or at the Civic Centre. The CIS aimed to have a '*linkage with existing consultation exercises, such as those undertaken in relation to the Community Plan, thereby making best use of existing resources and minimising the potential for consultation fatigue amongst the community.*'

The Deposit Plan Consultation Report & Sustainability Appraisal

The Deposit Consultation Report sets out what engagement the Authority carried out with regard to the deposit LDP and the timescales:

- The report makes clear that it carried out 16 engagement sessions held at venues throughout the County. However, these events were exhibitions with explanations of draft policies and guidance on how to respond in writing. Although this complied with the CIS, it is more a reactive process rather than engaging with communities as to what they would like to see and allowing input on such matters.
- As a result, it appears the responses were more likely to be objection or support rather than more constructive opinions on what a community would like to promote. The report does mention initial consultation but focuses on deposit consultation and at that stage it is difficult to seek more than response to policies. More research on the extent of influence communities have at early stages of plan preparation and how it influenced the Deposit Plan may be warranted.
- The Sustainability Appraisal followed a similar process but given the technical nature of the document this is not so unexpected. It is noted that the Sustainability Appraisal report was not amended as a result of the Deposit consultation.

Planning Inspectorate LDP Report

The Inspector did not go into significant detail on the Community Involvement Scheme. Its main approach was to consider whether it met what was said in the delivery agreement and considered the Community Involvement Scheme under the assessment of procedural requirements. The specific references are as follows:

- The report seemed to consider who and what was consulted on rather than the how consultation took place or its quality.
- The report acknowledges that the deposit LDP was subject to a draft Equalities Impact Assessment and meets the requirements of the Well-Being of Future Generations (Wales) Act 2015 (WFG Act).

Development Management

We have taken an example of a major application that was determined following the adoption of this LDP. The application we reviewed provided the opportunity to consider how engagement was addressed with pre-application work, the planning committee report on the application and a subsequent Planning Inspector's S78 appeal decision.

- The Pre-Application (PAC) report made clear reference to the requirements of the relevant legislation⁴³ and Welsh Government guidance⁴⁴. There is no requirement to refer to the LDP CIS and such there is therefore no reference to it. The PAC report detailed who was consulted and how responses to comments received were addressed.
- The planning committee report took a similar approach and referred to who was consulted as part of the planning application and summarised responses received. The planning appraisal section of the report addressed these responses. The S.78 appeal decision did refer to consultation responses, in particular third-party responses. However, as expected, the appeal decision focused on the main appeal issues and not on the application process.

This makes clear that the LDP engagement process did not link or progress to the development management process. There is no requirement on the applicant, LPA or Inspectorate to set out engagement methods or processes; they simply need to comply with the regulations on consultation.

Findings

The engagement process is primarily reactive, i.e. it responds to various consultations, leading to an 'object vs. support' approach. In our exploratory study the emphasis appeared to be on 'doing' consultation only rather than looking for meaningful suggestions through alternative modes of engagement. The focus of engagement seems to be further down the process (rather than at preferred strategy or deposit), at which point there is limited opportunity to engage and provide meaningful input in respect to crucial location and use choices. This is further constrained by timescales (both for engagement activity and within the scope of this work). In the scope of this study, it has not been possible to ascertain if and how engagement at all stages links, at least in respect to the same piece of land, as it has not been possible to trace easily accessible repositories for engagement documents; further exploration would be warranted to establish if this is a missed opportunity as part of early engagement or is simply related to the lack of published information. It would also be beneficial to identify how reporting to participants had been conducted in further work.

In practice, there appears to be a lack of consistency, transparency, and evaluation of engagement activity and very little institutional memory as to the value of engagement as a continuous process. This second vignette also warrants further research to ascertain the status quo in Wales today.

Conclusion

How did we get here?

In Wales and elsewhere, tensions between private property rights, advancing the public interest and furthering the cause of public participation could be the cause of much disillusionment in the planning system⁴⁵ and it is likely that, through the improvement of consistency, transparency and joining up of engagement, the whole approach to planning will mature and deeper trust will ensue.

The public are traditionally included based on *'the more abstract principles of democracy and justice'*⁴⁶, introducing further uncertainty in the land development process and denying any sense of public *'ownership'* (*vis-à-vis 'buy-in' or 'sense of civic pride'*) a special place at negotiating tables. These tensions are still visible in the working of planning in Wales, as our exploratory study suggests and the recent Audit Wales report on the efficiency of Local Planning Authorities in Wales⁴⁷ clearly show (see below).

Globally, there has been an increasing resort to sub-legal (e.g. technical reports) and supra-legal (e.g. referenda and popular votes/deliberations) devices to support accountability in

decision making to strengthen political democratic delegated power⁴⁸ in recent decades; it is now common to see technical reports by scientists and engineers used to back difficult political decisions and resort to forms of engagement in order to find ways out of contested decisions. The issue with this is that these measures are often introduced ad hoc rather than in a concerted way, with the twin risk of procedural inconsistencies occurring in time and space and of running 'parallel' to, rather than in complementarity with, existing democratic accountability systems.

Political scientists suggest that we are at a critical point in defining the path for democratic accountability, particularly in the UK where devolved administrations are taking different paths. It is important to define a Welsh approach to support democratic accountability for decision making that affects its land and resources, for current as well as future individuals and communities as this will strengthen understanding and trust in planning as well as in the wider administrative structures in a country that has put land and sustainability at the forefront of policy making.

Engagement of community should be a political act as it can constitute, at best, a form of deliberative collaboration between the state/government and its citizens (participative democracy). At present, it appears to be increasingly detached from the political dimension of decision making exercised by elected members (representative democracy). In Wales as in the whole of the UK (see Parsons and Rumbul, 2021) this might be further exacerbated by an apparent widespread reluctance by elected members to engage with residents exhibiting strong feelings in respect so specific developments, particularly if the former sit on the Planning Committee.

There are very few notable exceptions in the world where an attempt has been made to marry participative and representative democracy in respect to limited aspects of decision making. The most relevant example in planning is the Citizens Assemblies overseeing land use and development management in Canada⁴⁹. Further work might be needed to identify positive transferable examples from this case and other international cases that seem to have lessened or eliminated tensions linked to subsuming engagement as a technicality within planning practice and assess which features of those examples could apply to the Welsh context with minimal gradual change.

The Welsh approach: challenges and opportunities ahead

Two documents have recently been produced that might provide a springboard to further shape the planning system in Wales, particularly in respect to engagement.

The first of these documents is the Audit Wales report on 'The effectiveness of Local planning Authorities in Wales'. This report 'considers the progress of local planning authorities in delivering their new responsibilities and the extent to which they are acting in accordance with the sustainable development principle contained within the Wellbeing of Future Generations (Wales) Act 2015' (p.8). Its key findings are as follows:

- Despite an acknowledgement of the limited resources that government at all levels is dealing with, findings from the report are damning in respect to engagement:

- The public describe planners being more concerned about individual applications than *'encouraging and supporting the creation of a more vibrant and sustainable community'* (p.23).
- Effectiveness of engagement is queried despite the public showing a willingness to be involved in strategic decisions for their area as much as in place planning and place making.
- Communication is considered poor, as is the availability of information on what LPAs are doing: 'repeatedly our survey respondents told us they considered information to be inaccessible and not useful' (p.9).

The recommendations seem valid and worth swiftly pursuing, but it would be difficult for LPAs to conduct any review without substantial guidance from Welsh Government.

The recommendation to use *'Place Plans as a vehicle to engage and involve communities and citizens in planning choices and decision making'* (p.12) is fitting, but the risk is that focusing engagement on this level alone might hinder the linking of engagement at various levels to support communities' potential to steer positive spatial processes at a variety of scales (from strategy making to place making via place planning). This becomes particularly important since the new strategic planning 'level' has been introduced since the commission of this report. (i.e. How is engagement going to fare in decision making made at a level that does not have elected representations? And how does engagement at that level tie into engagement organized by other government levels affecting the same area?)

The findings need to feed into the consideration of engagement procedures for the planning system, primarily at Welsh Government level and secondarily through Local Planning Authorities.

Tailored spatially-aware guidance on planning engagement from Welsh Government is vital to support engagement processes that are continuous, joined up, multi-actor and inter-scalar.

The second relevant document is the *Well-Being and Future Generations Act of 2015 (WBFGA)* and a recent follow-up report from the Commissioner on progress in its implementation. The scope of the WBFGA is wide-ranging and effectively embeds UN Sustainable Development Goals within the working of government in Wales.

Particularly relevant in the context of this research project is the WBFGA *'sustainable development principle'* (Part 2, 5) which should underpin work of all parts of government, at all levels, in Wales. Specifically, part(c) which substantially reframes the need for engagement to include anybody *'with an interest in achieving well-being goals'* irrespective of their role in the process and to ensure diversity of those engaged. This seems to point to the importance of including 'local communities' and 'communities of interests' alongside 'stakeholders'. Establishing clear definitions for these actors will pave the way to the introduction of innovative methods applicable in variable geometries to fit the nature and complexity of each situation and local arena.

It has been acknowledged that embedding the ambitions of the WBFGA act within established institutions is challenging and will take considerable time and effort⁵⁰. It is suggested that the Act is marking a moment whereby Wales moves from devolution to Wales to devolution within Wales and that key will be the ability to devolve powers further down the line so that each

government task is designed, delivered and enforced at the lowest possible level for it to be effective. This might have to imply reconsidering the question: What engagement for whom at what stage? and thereby allowing for variable geometries that 'fit' locally and bridge effectively between strategy-making and place-making.

Despite highlighting planning, place-making, transport and housing as areas the Commissioner will focus on, the gaze is still predominantly around service areas and policy tools rather than processes underpinning development in planning and related areas – and the substance of these. There would seem to be scope therefore to develop the ambitions of the WBFGA in spatialised terms.

The WBFGA provides all the legal underpinning needed for the political and administrative wings of Welsh Government to produce policy, guidance, ministerial statements, frameworks, timelines and terms of reference explaining how the sustainable development principle applies to planning in addition to existing planning legislation and policy and so further guidance on engagement in planning would be beneficial.

Both the Audit Report and the WBFGA provide opportunities to push for our country to develop a distinctively Welsh approach to engagement, and possibly one that manages to avoid the pitfalls seen elsewhere. Whilst neighbourhood planning in England might be seen as leaning towards a populist approach and community planning in Scotland as a costly comprehensive exercise, the current situation in Wales might enable a closer link between the public's views, decision making and service delivery and providing an opportunity to marry elements of participative and representative democracy within the planning process through an articulated programme including short- and long-term actions to create this could represent the place planning agenda, complementary to the place making.

In addition, the Welsh Government and Design Commission for Wales have published the Placemaking Wales Charter, the principles of which organisations in Wales are invited to commit. One of the six principles specifically references the role of people and community; that they should be involved in the development of all proposals, and their needs, aspirations, health and wellbeing are considered from the outset⁵¹. This is only to an extent covered by the place-making agenda at present. Place planning could be developed further to join up citizens and community engagement across all representative and administrative levels in planning in Wales; in so doing strengthening trust and understanding in the planning system via valued processes as well as their valued physical outcomes.

A final but important consideration is how Welsh language ambitions are spatialized and integrated into placemaking and the wider place planning agenda⁵².

All considered, the road seems open to enable effective cultural change in respect to engagement in planning which might include: in a review of terminology in use; an effort made into sewing what spaces we have for engagement into a coherent process effectively linking technical and political moments producing clear guidance for all potential users; consistent tailor made training suites to enable and support effective use of the new system. However more spatial thinking is needed to expand and clarify the distinctive planning features of engagement affecting land and uses and to define differences and links between what is an essential place planning agenda (a continuum in time and space) and the developing place making agenda (deep and localized) where different agencies play a role.

Chapter 2: Research design & results

This chapter summarises the selected approach and key findings of the primary research undertaken by Planning Aid Wales during the project. Conclusions from this section will help shape data analysis and inform conclusions and viable short-, medium- and long-term recommendations.

Research design

The research was designed around three key questions:

- i). What is engagement?
- ii). Value of what for whom?
- iii). How to make meaningful engagement happen?

These questions helped guide both the desk-based literature and policy review (presented in the previous chapter) and the subsequent fieldwork phases. Fieldwork was organised into two successive phases: Phase 1 subsumes a scoping questionnaire and focus group meetings of selected participants; Phase 2 semi structured interviews and case study research.

Table 2: Research Design

Research Question	Literature, policy and legislation review		Fieldwork Methods	Phase
	Literature (Academic & professional)	Policy & Legislation		
What is engagement?	Review of selected sources -> clearer definitions may be beneficial.	Review of planning -> different terms are seamlessly and interchangeably used (vignette 1 – see page 24) in different levels of the planning system.	Scoping questionnaire -> + Focus Group ->	1
Value of what for whom?	Review of selected sources -> Saturation as to what creates value in the engagement process	Review of policy -> analysis of how engagement is seen and treated in one specific process (vignette 2 – see page 25)	Focus Group -> + Interviews -> + Case studies ->	1 & 2
How to make meaningful engagement happen?	Review of selected sources -> Saturation as to what support positive engagement	Critical Policy and Legislation analysis -> challenges ahead + cultural change (see page 28)	Interviews -> + Case studies ->	2

Informant selection

Informants were identified and selected from a number of sources that included Welsh Government and Planning Aid Wales stakeholder contact lists, in order to include representatives from:

1. Local Planning Authorities
2. Representatives from the development industry.
3. A wide range of third sector organisations with an interest in the built environment (communities of interest).
4. Community and Town Councils (local communities).
5. Members of the public who have approached Planning Aid Wales for advice in the past.

The opportunity to participate in the research was also advertised on Planning Aid Wales' website and social media channels. A full list of the organisations who participated in the research is available in appendix A.

Phase 1: Scoping survey and focus group

Scoping Survey

A questionnaire was designed with the aim of exploring the initial views on the value of engagement held by informants playing different roles in the planning system in Wales.

The questionnaire was structured as follows:

1. A series of open questions inviting informants to share their experiences of a engagement process they had been part of, their role, the positives and negatives and what would have improved the exercise.
2. A series of questions crafted around topics emerging from the literature that resonated with the researchers' own experiences of practice in Wales. These were inviting participants to rate how strongly they agreed / disagreed on a 5-point Likert scale with a number of statements relating to the following topics:
 - a. The benefits of good engagement
 - b. The negatives / disadvantages of engagement
 - c. Areas where engagement practice could be improved.

Each rating question was followed by an open question inviting informants to offer their own views on the topic.

Results from the survey informed the design of the focus group and the selection of cases for follow up interviews in Phase 2. A copy of the full questionnaire template is available in appendix C.

Focus group

A stakeholder focus group was held to bring together key stakeholders to review the results from the questionnaire and consider potential recommendations to better shape future engagement practice across Wales. It was made clear that the final report would be circulated to all participants and considered by Welsh Government's Planning Division.

Due to COVID-19 restrictions, the focus group was consolidated as one online meeting including all participants that had agreed. The meeting was designed primarily to be an open discussion which, given the number of participants, was structured around the following questions:

1. Should we be doing this?
2. What does meaningful engagement look like?
3. What should be done to make meaningful engagement happen?

The core question explored in the focus group was 'What needs to be done, who by and how to ensure that future engagement on plans and projects is done and is high quality to meet agreed standards?'

Phase 2: Interviews and case study development

A series of semi-structured interviews were held using online communication apps (Skype and Zoom) to explore experiences of engagement in Wales and case studies in greater depth and to identify both challenges and best practice within planning policy, supplementary planning guidance, Place Plans preparation and development management, fitting with a Place-planning agenda. Place-making was only marginally covered when relevant. Interviewees willing to participate further were selected to ensure representation of three different perspectives (local planning authorities, private sector / developers and communities) and wherever possible to represent differing levels of engagement activity (scheme design through to development management, LDP preparation and Place Plan work).

The findings of the discussions were used to develop case studies (below) and to inform the analysis in chapter 3.

Ethics & data protection

The privacy of individuals and the storage of personal data was considered at every stage of the research in the context of General Data Protection Regulations:

1. Personal data was gathered and stored separately to the responses to the questionnaire.
2. A full privacy statement was prepared and direct consent to store that data was sought.

In addition to the above, several participants expressed a desire to remain anonymous in the report, as such, individuals' names, positions and organisations have been kept anonymous and information provided by them presented in a non-attributable manner.

Data analysis

Reassuringly, the fieldwork seems to broadly align with the findings from our review: there is broad agreement and support for the principles of engagement in planning. There are however also novel insights worth of further investigation on how these principles are delivered through Welsh planning practice.

The literature and policy review highlighted several themes:

- T1. **Clarity and accessibility** – the value of engagement can be difficult to ascertain and is judged differently by the different actors in the planning system. Terminology is interchangeable and ill-defined. Clarity in terminology and processes can go a long way in supporting good engagement so shared understanding of the outcomes of engagement is necessary.
- T2. **Engagement as a continuous process** – engagement is disjointed both over time and at different levels of the planning system. Early engagement is likely to have more value, as is a joined-up approach seeing engagement as a continuum.
- T3. **Engagement as both a technical and political activity** – engagement can be viewed as a set of steps, which can hinder meaningful relations between representative democracy and direct representation.
- T4. **Transparency in decision making and accountability of outcomes** – it is seldom clear to all stakeholders what potential effect engagement can have on the outcomes of planning decisions.
- T5. **Certainty of process** – a desire to achieve certainty of process (if not of outcomes) within the planning process is worth pursuing for all stakeholders.
- T6. **Cost and equity** – Efficient use of resources can be at odds with fairness, particularly in respect to the hard to reach. Variable geometries of engagement ought to be considered to balance costs and increase equal access to engagement.

Qualitative data from fieldwork was condensed into issues, or ‘codes’, subsumed within the themes above to help organise and analyse the findings with the view of structuring recommendations. The findings of the exercise are presented in six sections within Chapter 3, presenting data analysis, using case studies to develop examples where necessary. Before proceeding to the analysis, a summary of the data gathered in Phase 1 and Phase 2 respectively is presented below.

Phase 1: Questionnaire results

Overview

95 informants commenced the survey and 84 completed the survey in full. The distribution of informants by sector is shown in Chart 1. The higher proportion of Community Council informants is attributed to the fact that Community Councils are Planning Aid Wales’ primary audience.

Driving target audiences to complete the survey proved challenging; only 6.7% of those invited completed the survey. Some sectors were more resistant to participating, notably Developers / consultants, some of whom stated that they had insufficient time to participate. Overall, the number of responses means that the results cannot be taken as definitive, but low response rates represents a strong findings in itself and is potentially an indicator of the lower priority placed on engagement, particularly by some stakeholders groups. Despite the paucity in numbers, the stronger trends reported provide a valid initial insight in the topic.

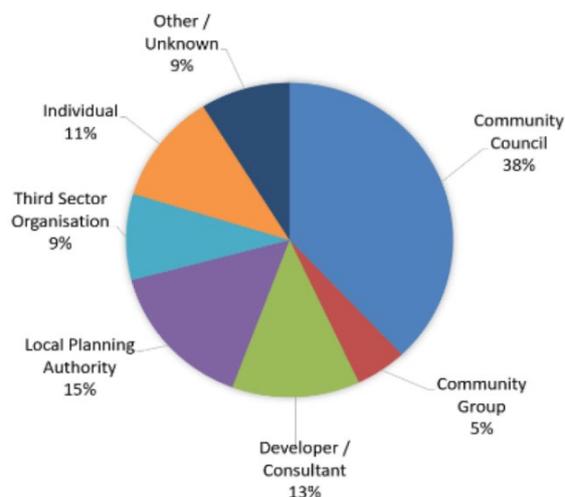
Engagement experiences

85 participants shared their experiences of discrete engagement activities. A sample of responses and the issues raised is summarised as follows:

Table 3: Sample of issues raised in survey

Informant sector	Examples of experiences
Community Council	Small community council takes the lead in the community whilst dealing with constraints of limited resources
Developer / Consultant	Proactive engagement prior to pre-app consultation using online tools advantageous but limited compared to face-to-face activity.
Developer / Consultant	‘no-shows’ and difficulty in securing sufficient detail from participants in stakeholder events.
Local Planning Authority	Proactive engagement work delivers positive results and improves relationship with community but challenging to deliver at different levels.
Community Group	Delivering engagement activity was valuable learning and development for group, but they found it difficult to reach a representative audience.

Fig. 6: Questionnaire informants by sector



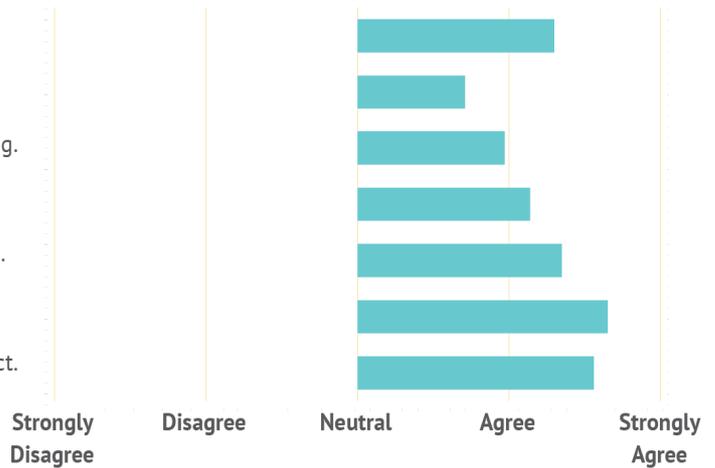
Each of the responses to the question was used to select potential candidates for interview and case study development, but it should be noted that only 35% of participants consented to be approached to participate further.

The benefits / advantages of good engagement

Fig. 7: Benefits / advantages of good engagement – all respondents’ average scores

Good engagement can...

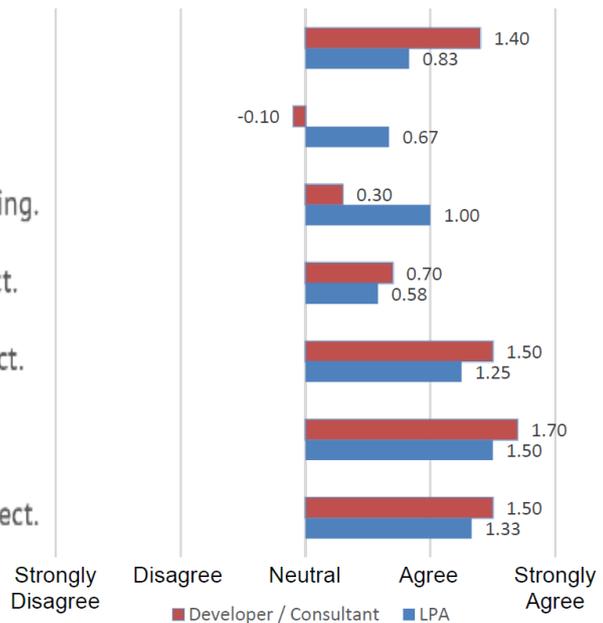
- Introduce community ideas, concerns, and aspirations.
- Introduce community knowledge and information.
- Raise community awareness and understanding of planning.
- Help to secure community agreement on a plan or project.
- Save time overall from ‘day 1’ to completed plan or project.
- Save resources overall from ‘day1’ for all parties.
- Improve the quality/deliverability of the end plan or project.



The results illustrate broad agreement on the benefits of engagement across all sectors, if less so on cost (resources) and time. Agreement was strongest across stakeholders on the idea that engagement benefits the development process by introducing community knowledge & information, as well as aspirations, ideas and concerns.

Fig. 8: Notable variations within groups – Developer / Consultant vs LPA

- Introduce community ideas, concerns, and aspirations.
- Introduce community knowledge and information.
- Raise community awareness and understanding of planning.
- Help to secure community agreement on a plan or project.
- Save time overall from ‘day 1’ to completed plan or project.
- Save resources overall from ‘day1’ for all parties.
- Improve the quality/deliverability of the end plan or project.



LPA's felt that engagement has value in saving time and resources within the development process. However, this contrasts with the view of developers and consultants who were less likely to agree with this idea. Perhaps surprisingly, developers are more positive on quality of outcome, understanding of planning and community contributions of information and ideas.

Other Advantages / Benefits / Comments (all respondents):

A summary of other comments on the benefits of engagement as fed back by participants is provided below (ranked by number of similar responses):

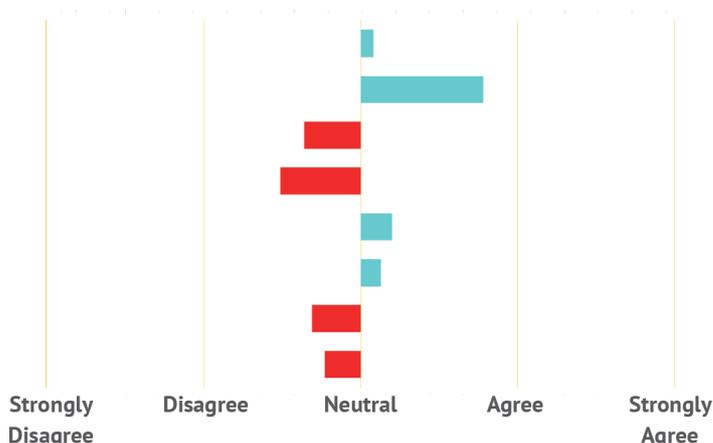
- The earlier the engagement the better – even before pre-application consultation and establish the outcomes of engagement exercises from the start (7).
- It fosters community ownership / responsibility and reduces fear of development (5).
- Opportunity to identify wider stakeholder views beyond current issue (3).
- Measure current priorities, fears and preferences to help tailor provision (3).
- People need to understand the importance of early LDP / strategy engagement (3).
- A guide to conducting community surveys would be extremely helpful (2).
- Can be difficult to measure whether time & resources have been saved (2).
- Need clearer understanding of the difference between community information and engagement (2).
- Time constraints should be recognised and accounted for (2).

The disadvantages / drawbacks of engagement

Fig. 9: The disadvantages / drawbacks of engagement – all respondents' average scores

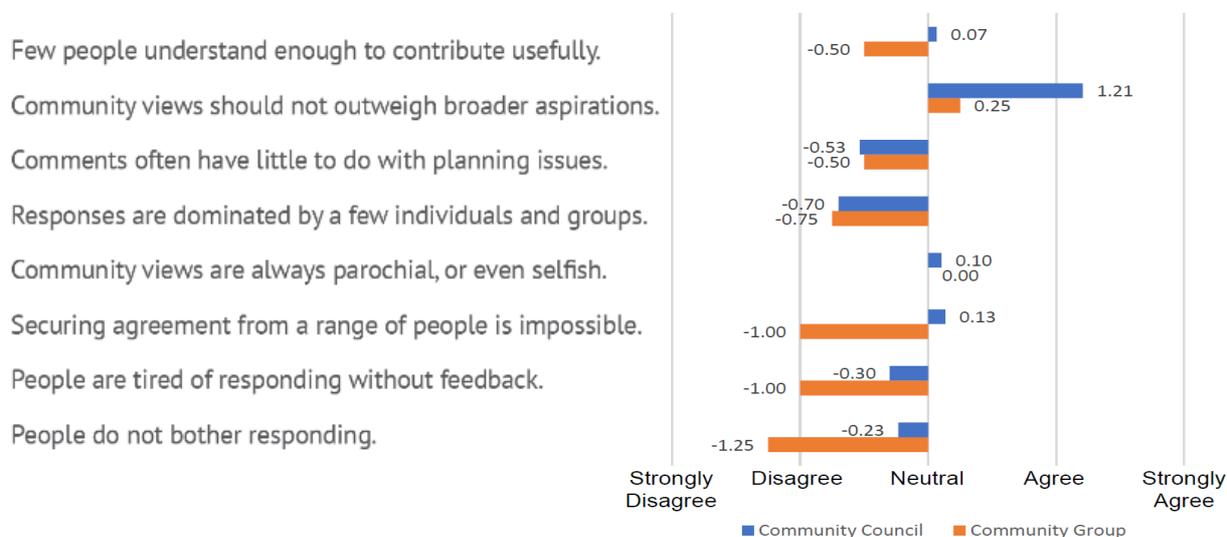
Engagement can be negative because...

- Few people understand enough to contribute usefully.
- Community views should not outweigh broader aspirations.
- Comments often have little to do with planning issues.
- Responses are dominated by a few individuals and groups.
- Community views are always parochial, or even selfish.
- Securing agreement from a range of people is impossible.
- People are tired of responding without feedback.
- People do not bother responding.



Generally, negative statements showed the lowest level of agreement and 50% were rejected across all groups. Agreement on the positives outweigh the negatives of engagement; the strongest agreement was that there is fatigue with responding to multiple consultations that do not seem to link, do not lead to change, nor provide feedback to participants. The most interesting variations between sectors came between community groups and community councils; community groups were less inclined to agree with the given statements on the negative aspects of engagement than community councils were, with notable discrepancy in views across the responses:

**Fig. 10: The disadvantages / drawbacks of engagement
Community Council vs Community Group**



Broadly, the stronger agreement with the negative statements indicates that community councils may be more cynical about the process. This may be due to the fact that as consultees, they have much more experience of responding to planning matters. However, also the nature and origins of community groups may be relevant; they may have been formed for a proactive specific purpose. What the results do not probe is the level of understanding of the nature and scope of engagement in the planning system, which may be a factor influencing the strength of opinions. For example, Planning Aid Wales trainees within Town and Community Councils consistently suggest that they feel more confident to exercise increased influence after participating in Planning Aid Wales training courses. Community groups overall disagreed strongly with the statement that people do not understand enough to contribute usefully. Both groups however agreed in disagreeing that it is impossible to find consensus through engagement, and that community views are parochial or selfish. Community groups disagreed with the suggestion that community views should not take precedent over broader aspirations in contrast to Town and Community Councils, indicating that a more nuanced understanding of ‘community’ locally is needed to design effective engagement processes.

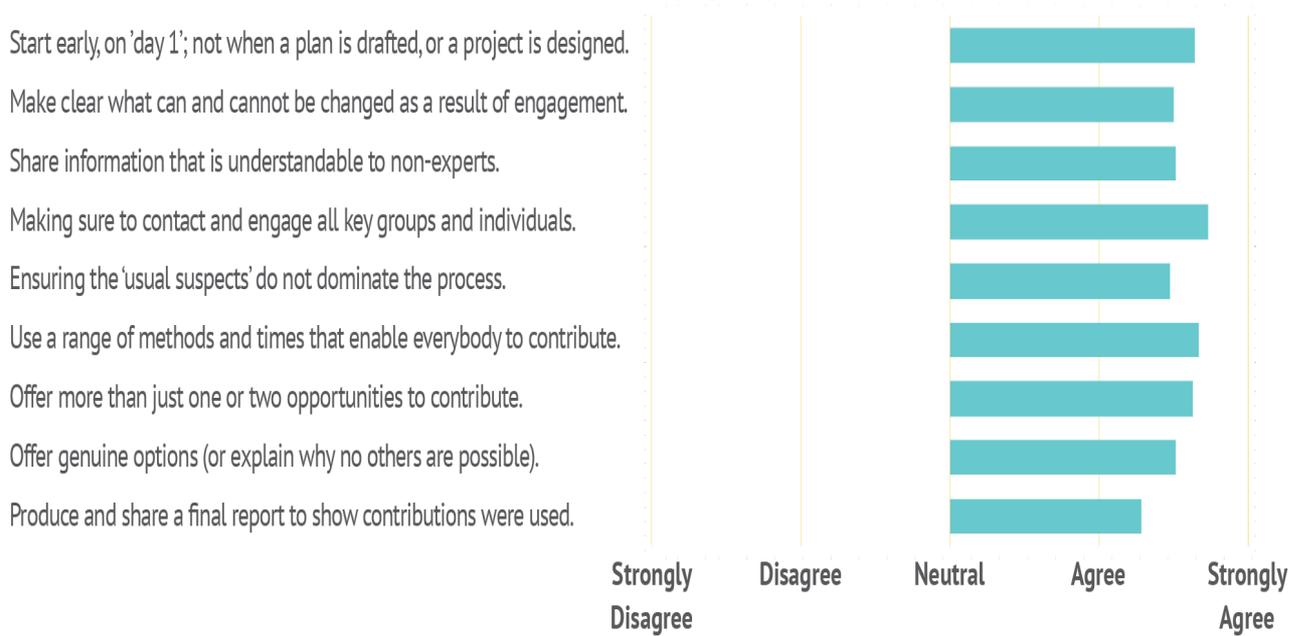
Other Disadvantages / Drawbacks / Comments (whole group):

- There is a silent majority who do not engage (4).
- Engaging with people offline (somehow), particularly during the pandemic is essential (4).
- Terminology used could be clearer (3).
- Cost and time factors (3).
- Community do not know how to engage fully; planning teams should help (2).
- People get disillusioned of people doing the same things with no change; consultations are over saturated (2).
- False expectations lead to disappointment (2).
- Opinions formed on misinformation/hearsay and not fact (2).

Improving engagement practice

Fig 11: Improving engagement practice – all respondents’ average scores

All respondent’s average scores...

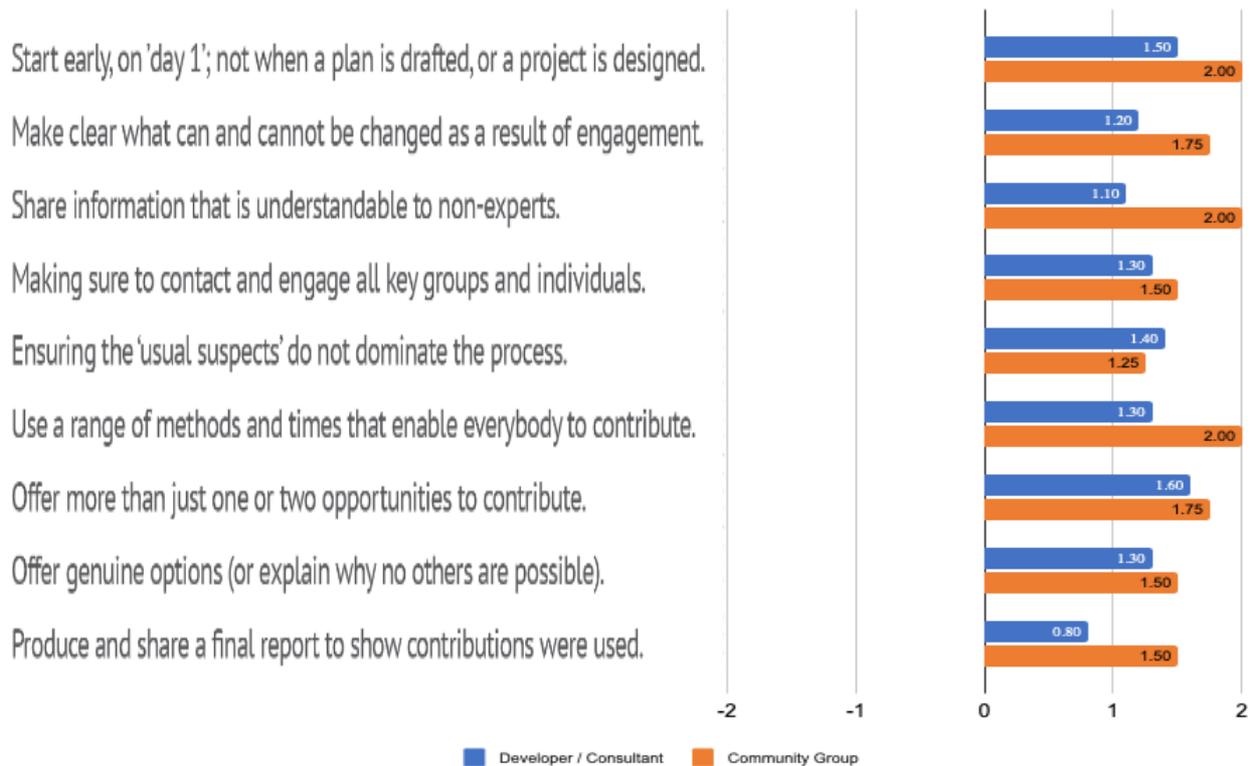


The strongest agreement amongst all groups were on statements about opportunities to improve practice. The strongest agreed suggestions were to use a (broader) range of methods, to involve all possible groups and to produce and share a final report to show how contributions were used.

Across the responses, community groups felt more strongly in agreement with these principles than developers & consultants, except for one. Developers and consultants felt more strongly that engagement should ensure that the usual suspects do not dominate the process, and the community groups were also in agreement with this.

There was wide agreement on all of the principles suggested as important to support effective engagement.

Fig 12: Improving engagement practice – Developer / consultants vs community groups



Other Suggested Improvements / Comments (all respondents):

- Using a mixture of techniques, online and offline. Timings of events to include working and non-working people (11).
- Clear easy to understand final report (3).
- Adapt to pandemic but keep it meaningful (2).
- Be clear about what is being delivered and why, not to give false promises (3).
- Bring more balance by engaging the hard to reach (2)
- Involving stakeholders in engagement e.g., taking them to sites / getting them involved in projects to show what is trying to be achieved (2)
- Use the right methods and ask the right questions at the right time and place (2).
- Community councils are voluntary and lack resources to access large numbers of residents.
- True engagement results in an easier and quicker planning process and results in less objections as a lot of the issues have been ironed out prior to submitting the planning application.
- Do not assume people won't understand.

Phase 1: Focus group results

Due to logistics linked to the pandemic, and reachable sample size, focus group data has been gathered via one two-hours online meeting attended by 21 participants, all of whom had completed the questionnaire. There was a far greater proportion of professional attendees at the event than in the survey, including the Planning Officer’s Society for Wales, RTPI, Royal Society of Architects Wales, Homebuilder’s Federation and the Youth Parliament.

The proportion of informants from the development sector participating in the focus group was much higher than that engaging in the questionnaire; perhaps indicating a preference for this form of engagement amongst that sector, or inversely, indicating a lower preference for community groups and Town and Community Councils to participate in such fora. It should also be noted that the time of day may have been a factor, as the meeting was held on a morning of a working day.

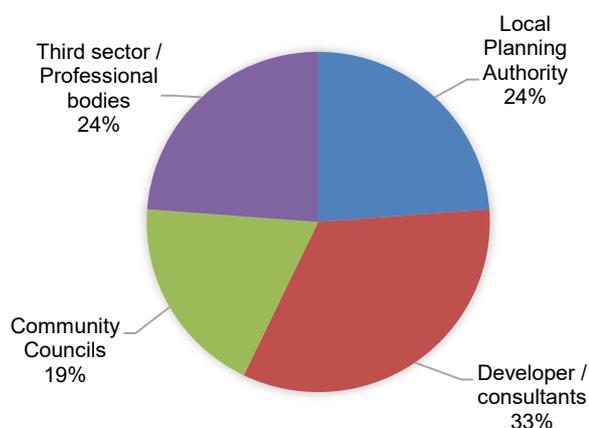
1. Should we be doing this?

The first question for participants was about whether engagement in planning is inherently a ‘good thing’. It was agreed that it is an important area, and comments highlighted its value both for plan-making and for development projects. It was also felt that the general culture is changing, and engagement should be done more often and more thoroughly. Engagement must be meaningful to provide good quality constructive engagement, going beyond a limited ‘tick-box’ exercise, for either applicants, planning officers and certainly for communities. The pros and cons raised generally linked with those stemming from the scoping survey:

Table 4: Focus Group – Pros and Cons of engagement

Pros of engagement	Cons of engagement
Introduction of local knowledge.	Resources (time and costs), for plan-makers and developers but also for the voluntary time for communities.
Avoiding objections and wasted time and costs later.	No clear evidence of its value or even of time/cost savings.
Easier progression through the system when people agree.	Lack of clear guidance, standards and enforcement of engagement.
Everybody can have a voice.	The profit dynamic of the development industry.

Fig. 13: Focus group participants by sector.



Participants agreed that, to be meaningful and add value, engagement needs to be flexibly designed and context-sensitive; different approaches are needed for different projects in terms of type, size, location and timing.

2. What might be meaningful engagement?

The importance of starting on 'day one' was supported. This seemed to be the most important principle because, if it does not happen, it is difficult to deliver on other principles. The emphasis on an early start is crucial but it raises questions on what 'day 1' is in the process (i.e. 'day 1' from the start of plan-making or 'day 1' from the start of the development process?).

Some highlighted the need to distinguish between consultation and engagement, but - chiming with the literature - it was recognised that different levels of informing, consulting, involving, and engaging are needed and are appropriate for different consultees in what would be a variable geometry in designing engagement processes 'fitting' a context as much as a specific development type. Others noted that to be genuinely inclusive, stakeholder agencies and authorities such as the police, must be included beyond the 'local community' and 'communities of interest'. These groups can add value to the process by bringing important extra information, issues and ideas.

Managing expectations and being clear about scope is important to participants. Feedback is also seen as very important, both during (it helps to keep people on board and believe they are being listened to) and at the end of an engagement process. Finding ways to make engagement activities more measurable was also agreed to be beneficial by most.

3. Making it happen

The participants agreed on the six main areas of future action described below. It was agreed that a key step forward to develop meaningful engagement would be to (a) ensure real consistency between them all in terms of benefits, principles, methods etc. and (b) make it clear that everything has multi-sector support so as to foster a process genuinely aimed at adding value for all.

1. Guidance

There was a very limited response when participants were asked what guidance they use. Mentions were made of Future Generations, Participation Cymru principles and the Placemaking Charter, but some participants felt that these have wider intent so there is a need for specially 'planning' guidance able to tease out and develop a spatialized gaze on engagement. Nobody was aware of the '*10 Commitments for effective pre-application engagement*' report, but Bristol's '*Statement of Community Involvement*' was mentioned. Such resources should be further developed for Wales and distributed to all audiences with related training and support made available. A Wales-focused '*10 Commitments*'-style report would be beneficial and different groups/sectors will need more sector-specific guidance.

The Development Plans Manual and Development Management Manual were both mentioned, although it was pointed out that neither provides useful, clear and specific guidance on engagement tailored to the variety of stakeholders to be engaged; the audience agreed that

they should. One critical issue participants agreed should be addressed is the prevailing views of some councillors that they must stay totally out of any engagement, especially on applications, to avoid any suspicion of predetermination. Such attitude, whilst understandable in the absence of specific formal framework for involvement, needs to be eradicated through guidance and sharing of best practice in favour of a more nuanced and articulated interaction between democratic and deliberative democracy in respect to place planning in Wales.

2. Training

People generally agreed about the importance of training for elected members and all sectors present. Training that brings different sectors together could be particularly effective, but training can only get people so far. Some proposed that guidance / training for Planning Inspectors on assessing the quality of engagement practice may be beneficial.

3. Case Studies

The audience were unanimous that developing and widely sharing examples of good engagement practice, ideally from Wales, was essential.

4. Support Service

It was agreed that a support service to provide advice and guidance on engagement matters would be beneficial.

5. Awards

It was suggested that a Wales-wide awards scheme for good engagement would be very valuable, both in its own right and in order to flush out good case studies. Planning projects about engagement can win RTPI prizes, though there is not (yet) an explicit category for engagement work to ensure this is properly recognised. If this were to be introduced, submissions should only be accepted with an endorsement from other parties (developer, community etc.) and should be for two categories: (a) plans and (b) projects. Perhaps a multi-sector awards scheme might also prove beneficial.

6. Leadership

There was agreement that some form of campaign to provide overall leadership and championing about more and better engagement is needed. That should come across the jurisdiction from the Welsh Government but also all the other actors represented by the informants in the focus group. It can also be picked at local level by groups such as Civic Societies. To further support promotional work, national and local Champions could be introduced. It was widely recognised that in order for this to happen, clear and consistent guidance would have to be in place.

Other Comments

Several people commented on the challenge of communicating 'planning' to people is extremely difficult and requires really creative approaches, as does any engagement.

Facilitators made it clear that the Welsh Government had noted that the legislative change could only be deliverable if considered necessary in the medium to longer term and one of the

aims of this project was to identify ‘quick wins’ and shorter to medium term solutions. This was recognised by the audience. However, a number of comments made suggests that the current legal requirement about pre-application engagement shortly before any applications are submitted on major projects is not helpful, and perhaps damaging, and certainly does not meet the principles agreed above as fundamental unless at least tied (formally as well as in terms of contents) with any engagement and consultation affecting that same land that had already occurred during plan-making.

It was suggested that bringing together the best of all the ideas above into a coherent programme could help to create a significant shift in practice. Such bringing together should use clearer definitions and consistent principles, outline appropriate methods in context and involve multi-sector support. Some new additions are needed, however, such as a national leadership campaign.

Phase 2: Interviews results and Case Study development

In order to further the understanding of the issues explored in the survey and discussed in focus groups, a series of in-depth semi-structured interviews were held with 15 informants from a range of different sectors and having different perspectives on engagement.

Brief summaries of initial findings are presented below; all were considered in the analysis that follows and some were developed further and presented as case studies where appropriate in the next chapter.

Individual identities and places of work have been kept anonymous where possible and where requested.

Table 5: Summary of interview findings

Interviewee(s)	Key issues discussed
LPA	Conflict in various guises between local desires and strategic development goals. Consultation can become ‘box ticking’. Place Plans, resources and implementation into strategic development.
Developer / Consultant / Architect	Example of thorough early-stage approach to engagement on a community building. Local resident key in championing the project to community networks to drive early engagement and built a level of trust with LPA. Finance and support uncommon to enable this level of engagement.
Town Council	Development of a Place Plan. Challenges in development but enormous benefits already identified, not least leveraging inwards investment on the strength of evidence gathered during preparation.

Interviewee(s)	Key issues discussed
Local Planning Authority	Challenges of delivering meaningful engagement – low participation in early engagement events where there is no controversial issue raised. Difficulty engaging during COVID-19, challenges in identifying appropriate online engagement tools. Low interest in Place Plan development in areas with no community councils.
Planning Consultant(s)	Consultants' perspective on a green infrastructure project, working with council and national park. Lots of stakeholders/involved parties with misaligned expectations. Aim of project not made fully clear. See benefits of online engagement tools, but aware that other methods have a key place. Best time to engage will depend on what the intention of the engagement is. Local knowledge is increasingly valuable as planning officers less familiar with their 'patch'.
Local Planning Authority and Town Council.	Place Plan preparation from different perspectives. Emphasis on 'bottom-up' approach from outset, however this presented issues when identified desires/priorities were hard to categorise in planning terms and align with strategic development goals. Major factor of early momentum and success was a proactive Town Clerk with engagement experience.
Local Planning Authority.	Resourcing appointment of a dedicated Community Development & Place Plan Officer, one of the only such named officers in Wales. Discussions around advantages and challenges of engagement and consequent benefits of having such a role in the planning team.
Consultant / Community Engagement Specialist.	The enormous interest and buy-in from all sectors in engaging through the arts in built environment projects.
Community Council	Pre-App public Consultation event – PAC process not successful in creating positive local engagement, despite consultation event perceived by developer as having gone well. Mostly due to public perception that their input was ignored, and were not kept in the loop. Resulting break down of relationship between the public and developer was partly rescued by a face to face (online) event where developer was able to explain their position.
Consultant / Community Engagement Specialist	Supporting client to deliver a sustainable new community, working with neighbours, who are the experts in their local area. Value of early engagement, challenges in delivering and developing activities. Discussion on further research on role of elected members in planning being delivered by company (outside of case cited).

Chapter 3: Interrogating current practice (Analysis & Case Studies)

This chapter identifies and organises all data gathered in the literature review, policy review and fieldwork to identify common coded issues to guide progress in improving engagement and exemplify relationships between them. These codes are then linked to the relevant themes emerged from the review section (see Chapter 1, page 18):

Theme 1 – Clarity and accessibility

Theme 2 – Engagement as a continuous process

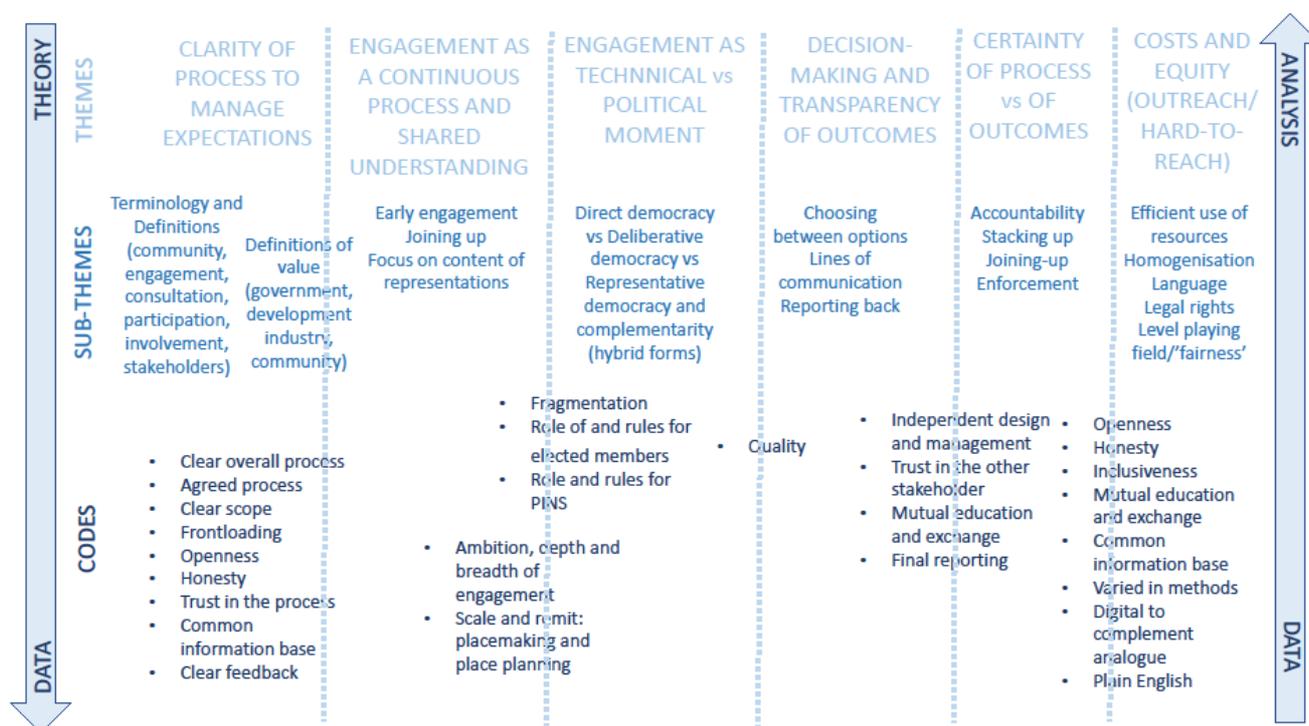
Theme 3 – Engagement as both a technical and a political activity

Theme 4 – Transparency in decision-making and accountability of outcomes

Theme 5 – Certainty of process

Theme 6 – Costs and equity

Fig. 14: Coding data to link with themes from the literature

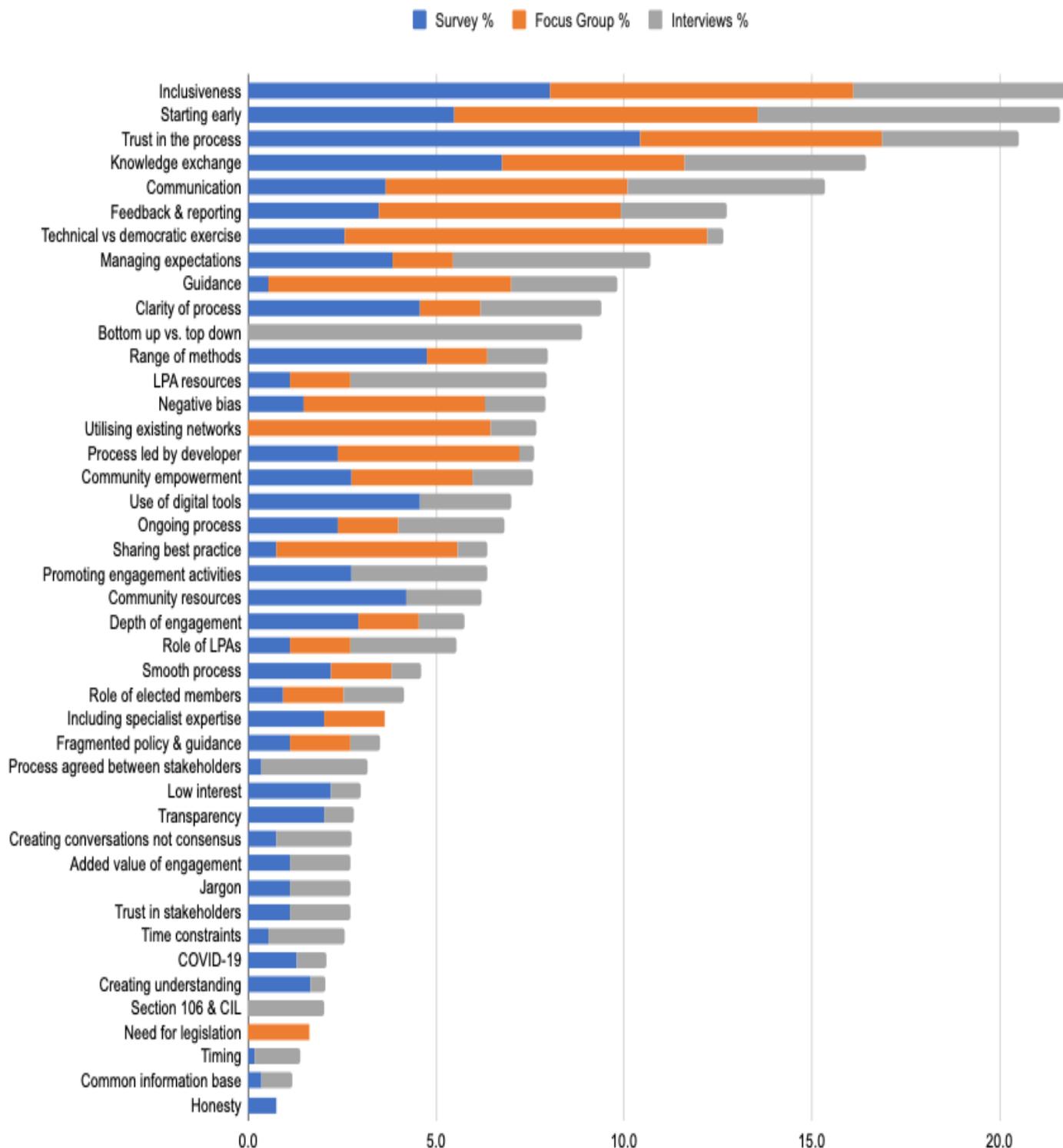


Key issues from the fieldwork

A series of 43 codes (or issues) were identified based on data gathered through all methods employed in the fieldwork and the number of times each key issue was brought up was recorded. These key issues were then linked to the method they originated from within the

project, namely questionnaire, focus group and interview. The number of occurrences of these issues across the three sources is illustrated in the chart below:

Fig. 15: Frequency of qualitative codes (issues) raised across different research methods.



Key issues that occurred most often across all activities comprised: a need for inclusiveness, to start early, build trust in the process and exchange knowledge. Some key issues were more frequently recurrent but notably in respect to data gathered via a specific method: for example, 'bottom-up vs. top-down' and 'Section 106' were mentioned frequently in interviews but not at all in other parts of the work. Other key issues such as 'trust' commonly emerged in data gathered via different methods. Despite the strength of some views presented on honesty, timing and legislation, these issues occurred least frequently across the fieldwork.

Interestingly, the impact of COVID-19 was mentioned relatively infrequently. All key issues are illustrated in this report as – in an exploratory piece of work relying predominantly on qualitative data – frequency is of little importance.

The need for clear and ongoing communication more generally was the fifth most frequently occurring and as such, communication practice including the use of language were grouped and discussed collectively. The remainder of this chapter organises and discusses the findings of the codes under the themes identified from the literature review.

Theme 1: Clarity of Process

1.1 Be clear about what engagement actually is.

Relevant issues: Communication, range of methods

Key findings: Terminology in law, policy and practice in Wales could be clearer and this is reflected in informants' views.

The literature review identified that planning terms for 'engagement', 'consultation', 'involvement' and other similar terms are not well-defined and used interchangeably at different levels of the planning system. This was reflected in our desk-based study of policy presented in the vignettes (Chapter 2) as well as in our fieldwork, where a variety of views emerged in terms of what engagement meant to different stakeholders. Further guidance on engagement in the planning system to provide better definitions would therefore be beneficial.

The policy review explored a Community Involvement Scheme correctly stated that engagement should be context-sensitive, but then the remainder of the LDP process relied on a limited number of generic consultation / informing style activities. In fieldwork, typically, most stakeholders agreed that engagement should be an activity that adds value, for example by enabling to harness local knowledge that would otherwise be overseen: *'an opportunity to incorporate the views of others in a meaningful way'*.

However, one LPA Officer suggested that engagement was a means of communicating and promoting a project, akin to informing. Another informant reported dissatisfaction with exercises aimed at informing only as it fell below their expectations. A planning consultant suggested that it is paramount to the success of any exercise to make clear whether they are about informing or a 2-way exchange. A town council informant went further in suggesting that the difference between consulting and engaging should be defined in legislation.

It is recognised that this research has been exploratory; further research may be able to establish causal links between terminology and engagement practice. Such research may be able to identify opportunities to better define and use a hierarchy of engagement terms at national policy, local policy and development management levels without being unnecessary prescriptive about engagement approaches or methods. Nonetheless, being clear about the engagement activity on the table at any given point from the outset will help managing expectations for all stakeholders and considerably reduce some of the frustrations informants reported having with current processes.

1.2 Clearer guidance on engagement

Relevant issues: Fragmented policy & guidance, creating understanding, common information base, communication, trust, timing.

Key findings: Existing policy and guidance on engagement in planning is fragmented and vulnerable to assumptions in respect to engagement.

Results from this research identified that some stakeholders felt clear guidance on engagement would be beneficial, particularly in relation to the public's role in the planning process.

Informants from local communities and communities of interest highlighted this issue particularly, showing that for some the many stages of involvement read as 'duplication'. Also, the availability of different supporting material from many different organisations can cause confusion in lay participants in planning engagement. This fragmentation is particularly striking when different planning-related consultations take place at the same time or when different actors are promoting and running consultation exercises over time.

"There are too many organisations involved with different views and guidance notes which again leads to confusion."

(Community Council)

1.3 Use appropriate engagement methods appropriately.

Relevant issues: range of methods, engagement depth, low interest, communication, clarity of process

Key findings: Varying engagement approaches to fit the context, type of project, audience and planning/development stage is essential. Engagement exercises should be accessible and avoid use of planning-specific language for increased accessibility. More support to LPAs is needed.

Chapter 1 identified that there is an over-reliance on a limited range of traditional engagement activities such as consultations, drop-in sessions and workshops, despite there being an enormous range of approaches and tools that could be used. If engagement activities must strive to add value, inclusion of as many relevant parties as possible ensures that outcomes are representative of the public's needs, whilst also increasing the opportunity to marry local knowledge with professional expertise in devising spatial solutions. In order to

achieve this, a range of engagement methods should be employed to suit different groups of people, different contexts and types of projects and different planning stages. These could include both digital and traditional face to face events. The fieldwork returned an impression that not only a handful of methods are employed in Welsh practice but also that some of these methods are routinely used as default, without much thinking on the appropriateness and 'fit' of methods used to the context, population, type of project and planning stage of each exercise.

Several LPA Officers reported that trying to engage on a 'blank page' is difficult and unproductive, but so too is concealing a decision that has effectively already been made under the guise of 'engagement'. Some comments also betrayed difficulties stemming from a lack of familiarity by officers with the richness of engagement methods. Whilst most officers seemed aware of various approaches and certainly careful treading in what is very sensitive work: there was an awareness that a number of factors could lead to similarly designed events turning negative, not least the nature of what an issue is and how an issue is communicated. There was also a distinct wariness in embracing variable geometries of engagement: it seems widely recognised that varying engagement tools and methods may have time and cost implications and many informants highlighted the need for guidance as to what kind of engagement to use when, since it cannot be 'one size fits all'.

"This unstructured event allowed for discussion and benefits for public as they could discuss matters with planners, also for planners to understand issues that perhaps would not have come across on a form or written submission." (LPA Officer)

vs.

"the drop-in was more akin to a consultation exercise than engagement - in that 'this is what we think, tell us what you think of this' as opposed to 'what do you think?'" (Same Officer)

As well as designing 'fitting' engagement exercises, care should be given to the language used to ensure it is understandable by non-planners and that the public can engage effectively. 2 LPA Officers suggested that the use of jargon will deter people from engaging, as it serves as a barrier to public understanding of what is at stake. Another Officer suggested that it is not just technical language that is a barrier, but the fact that certain planning documents are overly wordy. A fourth Officer went on to suggest that it should be their responsibility to produce clear and concise (but not patronising) versions of information for the public.

Findings from the fieldwork suggests that more support might be provided to LPAs to devise fitting engagement exercises that are accessible by the relevant audience. Ownership by LPAs is important as they are best placed to know their context and public and are ultimately duty-bound to engage. LPAs need a variety of support to initiate meaningful engagement that adds value to planning processes they run. Best practice from cases in this study should provide a first line of tackling the problem; Beyond that, guidance could be issued as to the pros and cons of various tools. Medium to long term appropriate training and support should be provided to front line officers who work to very tight schedules, and appear to lack in resources and confidence; guidance to elected members involved in decision making would also be beneficial as would fostering public awareness initiatives using innovative media to reach various types of citizens and groups.

1.4 Advertise clearly, promote widely and encourage effectively.

Relevant issues: Promoting activities, communication, creating understanding, jargon, transparency, range of methods, trust, negative bias.

Key findings: In order to overcome low interest and reach the silent majority, using lay language and methods nearer to people's lives could improve the reach of advertisement. Innovative use of visuals could better promote events. Encouragement will come over time through trust.

Statutory engagement activities such as Pre-application Consultation and development management notifications are promoted using planning-specific language, using methods of communication detached from people's ordinary lives. This is at the root of a general perception that LPAs and developers are poor at communicating with the public. Language used as well as methods of communications might be correlated with engagement activities generating little interest. Clarity emerged as a fundamental feature to meaningfully engage.

Data shows there is cross-sector agreement that existing engagement activities typically attract low levels of interest, making it challenging to effectively encourage participation and achieve added value. One LPA Officer suggested that the term 'consultation' puts people off when promoting engagement activities and LPAs generally agreed that promoting the benefits of engagement in planning to the public was challenging.

"One LDP looked at their engagement statistics – and only 0.01% of the population had responded and these were mainly men over the age of 60!"

(Planning Consultant)

In terms of the promotion of engagement exercises, resorting to traditional media was approached cautiously and one LPA Officer stated that the press can be unhelpful in communicating information around LDP preparations, causing unnecessary concern and added work. A developer suggested varying approaches from leaflet drops to social media advertising proved effective in different exercises. A different developer followed a similar approach, using various online and offline techniques at different stages, with positive results. Using a multiplicity of communication channels in synergic fashion seemed to produce good results.

In general, those who are in charge of organizing engagement events seemed to lack an effective repertoire of effective and fitting methods of advertising, promoting and encouraging engagement: e.g. one developer stated that information was delivered to nearby residences as a means of consultation and suggested that it was 'difficult to ascertain what more could have been done'. Suggestions provided by informants to broaden promotion of planning engagement opportunities included:

- Drawings should be sent to affected properties before submitting an application.
- Site notices could include plans and visualisations.
- Visual approaches, particularly video, may be more effective in helping people understand what is being proposed.
- The use of social media platforms as a means of promoting engagement activities was highlighted as an area which should be further explored.

- Individuals that act as ‘local champions’ are an effective way of promoting engagement activities.

Notwithstanding the lack of innovation, and interest therein, all audiences agreed that effective advertisement using simultaneously and in a synergic fashion a range of channels (online and offline) was needed to attract more people to get involved and to build trust. Whilst developers have recently resorted to using PR companies with good results in terms of publicizing events, LPAs might need support to develop effective communication strategies for planning matters that ensure consistency and transparency over time. Promotion could be effectively enriched by the use of graphic and generally visually richer communication, whether online and face to face. Encouragement, ultimately, might be supported by increasing trust developed locally over time on the score of a good tracked record of meaningful engagement.

1.5 Share best practice and guidance.

Relevant issues: Guidance, sharing best practice, common information base, using existing networks, LPA resources, promoting engagement activities, knowledge-sharing.

Key findings: The value of good engagement practice should be celebrated and shared systematically to help build understanding.

As well as developing more context-sensitive guidance and training for a range of stakeholders on engagement in planning, all sectors agreed that there could be more done to systematically share and promote guidance and case studies on the topic.

The focus group raised that there needs to be better leadership in terms of guidance and elected members at all levels would benefit from training on the engagement process which would create understanding and enthusiasm. A developer stated that they would benefit from guidance as to what kinds of engagement techniques to deploy at different stages and training together with other stakeholders would have added value. A CTC suggested that the public could be trained on planning issues directly.

“Our project is used as model by other aspiring communities wanting to deliver similar facility.”

(Community Council)

The content of this report could be used as a catalyst for better promoting the value of engagement and routine calls for and sharing of case studies would help raise the profile of the activity; annual awards would also be an ideal mechanism to share best practice.

Case Study: Place Planning in Aberystwyth



Background

When Ceredigion County Council's Economic & Regeneration Service took the initiative to follow Welsh Government ambitions to adopt a new approach to community planning in Wales and start the Place Plan process across the County – Aberystwyth Town Council, along with 5 other Towns were invited to produce their own Place Plans. At the time of the interview, Ceredigion County Council were still working with towns across the County to develop place plans for the six main towns and their surrounding communities. Progress has been delayed as a result of the COVID-19 pandemic but the process of finalising these plans has resumed.

Aims of the project

Aberystwyth Town council were encouraged to engage with their local community to develop a vision and to produce a Place Plan – but they also wanted to undertake wider engagement to get a picture of what people wanted in the town and how they wanted it to look in the future.

How did they do it?

The starting point for the Town Council was organising an initial Stakeholder meeting in 2018 which was able to draw out interested parties to set up a Working Group. The working group comprised of several interested parties including adjoining community councils, business interests and the university. A workshop followed in early 2019, which attracted over 40 people from all sectors of the town. Utilising the Post-it note engagement technique everyone had the chance to write down the strengths and weaknesses of the town and what their ambitions and vision for the future of Aberystwyth would be.

Everyone had the opportunity to put the post-it notes into themes and what evolved was the skeleton themes to take forward within the Place Plan. Gweneira Raw Rees (Town Clerk) noted that “the workshop produced valuable information – it was a simple

mechanism and it worked well”. She also added that “the workshop was a success which demonstrates the vast amount of time / administration resources required for a project of this nature to succeed”.

Following the workshop event, questionnaires were distributed throughout the town to gauge local views and opinions. Just prior to collecting the initial evidence – an external Consultant (funded by the Cynal Y Cardi LEADER Project) was appointed to advise on the engagement process. The ambition of Ceredigion County Council is to have a Place Plan for each of the 6 main towns across the County.

The Steering Group have noted that it was initially difficult to get the wider audience to understand the concept of a Place Plan. It was noted that the consultants came in during the initial evidence gathering stage . In hindsight – some assistance from professional planners / LPA Planners from the outset would have been helpful however Ceredigion County Council felt there was merit in the towns being able to explore ideas without undue influence from a Planning Consultant or the LPA.

What is of Value?

The project has led to several interesting projects being identified. The Place Plan concept has allowed local communities to get involved in a “planning” project whilst not homing in on planning related issues from the outset. The “open” conversation style of engagement attracted more people to get involved and has “allowed open discussion on a range of topic areas and themes” (Aberystwyth Working Group). A wide cross section of the community attended the workshop and engaged in surveys and enthused those involved.

Identifying Community Champions to lead the engagement has been invaluable, and Alain Haird of Ceredigion County Council noted that Towns “that had a champion seemed to achieve greater results from their engagement”. The County Council has confirmed that the results of the engagement programme across Ceredigion has been invaluable for other programmes such as the Public Service Board - Understanding Communities Group and has been used internally by the Council to inform the recently published Economic Strategy, provided evidence for a Levelling Up Fund application and helped secure a Greener Infrastructure Grant for Lampeter, enabling a project identified in the Place Plan to come forward.

Summary

Communities have pulled together in Ceredigion to produce Place Plans for their own areas, the whole council area approach has been led by the Economy & Regeneration Service of Ceredigion County Council with Aberystwyth being one of 6 towns involved. The final plans are yet to be delivered and considering the Pandemic a “Covid-19 lens” now needs to be used to assess recommendations and policies going forward. The Planning Policy team is now engaged with the process of bringing the Plans forward for

adoption as Supplementary Planning Guidance, so that they will carry significance in the planning process

Lessons learned:

- Set up a Steering Group early in the process – identify Town Champions – a key link to move the process forward.
- Don't label as "Public Consultation" – as often this is linked to negative perceptions. Public engagement needs to be a "conversation" – use innovative techniques to encourage the community to get involved, such as story studios.
- A facilitator with experience of engagement and Planning is invaluable to take projects forward. Although a "bottom-up" approach is encouraged – communities still need to be "led" and assisted with guidance, training, and planning expertise.
- LPA Policy Officers to have some involvement at the outset – this is essential to assist the process, for everyone to understand the planning implications moving forward and for the Place Plan to ultimately go forward for adoption as SPG.
- Experts with planning expertise to get involved so the community understand how the Place Plan fits within the LDP process – help guide the process.
- Place Plan training should encompass all at the outset – CTC's, Steering Groups, County Councillors.
- When working on a Place Plan important to focus on a particular geographical area – identifying this at the outset will allow greater understanding.
- Place Plans can also contribute to other strategic approaches such as Economic Strategic Planning

For more information:

Aberystwyth Town Council <https://www.aberystwyth.gov.uk/en/>

Ceredigion Economy & Regeneration Service: <https://www.ceredigion.gov.uk/placeplans@ceredigion.gov.uk>

Cynnal Y Cardi LEADER Project - <https://www.cynnalycardi.org.uk/leader/>

This project has received funding through the Welsh Government Rural Communities – Rural Development Programme 2014-2020, which is funded by the European Agricultural Fund for Rural Development and the Welsh Government.

Interviewed for Case Study:

- Ceredigion County Council Economy & Regeneration Service
- Aberystwyth Town Council
- Aberystwyth Place Plan Steering Group

Theme 2: Engagement as a continuous process

2.1 Start early.

Relevant issues: Starting early, smooth process, timing, trust, depth of engagement.

Key findings: The earlier meaningful engagement takes place in the planning process, and the more it connects to Place planning, the better the likely outcomes for all stakeholders.

Both the literature review and fieldwork concurred that early engagement in planning builds a sense that participants' input will be valued as it can be considered in the development of proposals, in contrast to later involvement which can be seen as tokenistic once proposals appear to have already been developed.

"If the community is involved from the start, they will take the project through in a positive manner."

(Community Council)

For developers, engaging early serves to identify potentially contentious issues before resources are committed and can therefore facilitate a more positive development process, as well as providing an opportunity to more generally to incorporate knowledge and ideas generated locally into the proposal. Starting early can also help to establish a working relationship between a variety of stakeholders through a shared understanding of place.

For LPAs, the focus seems to have shifted to engaging people at the early stage of plan-making, so much earlier than at the start of the development cycle (i.e. much earlier than pre-application or planning application stage) in order to promote a more positive and proactive relationship between the public and the planning process. More active encouragement of Place Plan take-up and timing may assist with this. One LPA representative suggested that candidate sites should come after the preferred strategy consultation stage of an LDP, as the former serves to distract consultees from the more strategic issues. An effective and well-timed Place Plan preparation could foster such an approach.

PAC was mentioned as having contributed to starting early, but its effectiveness can be impacted by the extent that it is treated as a 'tick box exercise'. Several respondents across sectors suggested the idea of 'pre-PAC' consultation looking at engagement as an exercise aimed at adding value. This, again, could be linked to Place planning.

A Community Council highlighted that it is important to have all stakeholders, not just in the public sector, on board at the start, e.g., all relevant departments within government at all levels as well as relevant private sector and communities. This idea was echoed by a local authority representative on the same project, and a consultant on a separate project.

However, a planning consultant raised the point that engagement must take place at a time that is appropriate to its objectives. Whilst starting early is generally considered to be of benefit, there may be instances where that is not the case and doing so may create challenges

in managing expectations. This comment seems to go back to the question of meaningful engagement capable of adding value.

Overall, it seems that an early start (coinciding with plan making stages) is deemed valuable in as much as it engages all relevant parties (albeit in different geometries at the various stages) at all points in time in some way and is in particular well connected to Place planning. This might have to be further clarified in policy and further training may be necessary to make these kinds of decisions well informed.

2.2 Make engagement a joined-up ongoing process.

Relevant issues: appropriate engagement methods, communication, role of LPAs, trust, community empowerment, inclusiveness, feedback & reporting.

Key findings: Engagement is more meaningful when seen as a continuous exercise subsuming a series of linked stepping stones (rather than separate one-time consultation exercises).

However praised 'early start' has been in the fieldwork, participation fatigue and lack of understanding of the scope and goal of engagement at each stage can cause frustration and possibly prove counterproductive over time.

There was cross-sector agreement that engagement should be ongoing and involve all stakeholders, to a greater or lesser extent, over the course of the planning and development management phases in order to add value. At present, most engagement occurs on a project or activity basis, in a Local Development Plan or an individual Pre-Application Consultation. There is currently no sense that an exercise follows on from a previous one insisting on the same parcel of land. In addition, it is extremely difficult to track community feedback over time or across different projects. This produces dis-orientation in participants, fosters misunderstanding and mismatch in terms of expectations and frustrates communities adding to an existing sense of *consultation ennui*.

"Planners should be encouraged to listen to small public groups at all stages of the process and continue to engage after the public consultation is over."

(Community Council)

One planning consultant highlighted specifically that getting 'sign off' on a final design before construction starts is an important step and a developer reported that ongoing engagement has been beneficial in terms of securing 'buy in' from the local community. At a minimum, there should be feedback on the outcome of an engagement activity, but revisiting the topic can bring out more local knowledge, and help to create further trust and buy-in. A planning consultant also identified that keeping communities informed has lasting benefits. Our vignettes show clearly how difficult it is (for planners) to find information about past exercises insisting parcels of land currently being developed.

Whilst continuing contact with groups may be difficult (particularly when different promoters organise engagement – i.e. different LPAs' divisions, developers and planning consultants), some method of recording, archiving accessing information on past activities in a consistent,

accessible manner may be beneficial. It is recognised that a continuing dialogue may be difficult in the context of resources, but there are examples where this has been delivered via a dedicated officer and has proven to be beneficial (see Conwy case study). Having individuals in this kind of facilitation type role that are seen to be available on an ongoing basis can build trust and stronger relationships over time. Alongside dedicated officers, the possibility of developing and adopting easily accessible on-line repositories consistently archiving outcomes of engagement exercises over time for sites could be explored. At the least, maintaining a centralised digital record of engagement activities would be beneficial.

2.3 Create conversations lasting over time, not consensus.

Relevant issues: appropriate engagement methods, negative bias, depth of engagement, inclusiveness, smooth process, transparency

Key findings: The aim of engagement activities should not be to reach consensus on every issue, but to expose people to the views of others and create common understanding that adds value to specific projects/planning outcomes as well as planning processes and local trust in the planning system and public administration.

Data suggested that consultation activities as currently conducted can generate a sense that there are ‘winners’ and ‘losers’ in the process and engender a negative bias towards participation in a locality. Planning Aid Wales has consistently found that explaining the context of an issue, hearing what people have to say and feeding back to them even if a decision does not go in their favour is far more positive to maintaining and building relationships than attempting to please a majority. This has been supported by findings in our focus group.

In the fieldwork, one LPA Officer indicated that reaching consensus around planning issues is very challenging and similarly a planning consultant noted this by stating that ‘you cannot please everyone’.

However, several informants shared a view that consensus should not necessarily be the aim of engagement. One architect described the designer’s role as ‘facilitators of a conversation’.

“Companies shouldn’t assume that we are incompetent and can’t agree to disagree. A community is very good at compromising.”

(Individual)

A Community Council noted that by drawing in a wide cross section of people in an engagement exercise, diverse and contradictory views were received. However, it was still possible to collate themes from the process that added value to the overall planning process. A planning consultant agreed, noting that face-to-face engagement is far better than a written consultation as it gives an opportunity for views to be challenged and constructive exchanges to take place. This view was shared by an LPA Officer and an individual, who agreed that communities can compromise and hear ‘no’.

In order to shift the focus of stakeholders from ‘winning the game’ to constructive teamwork, engagement needs to be carefully designed to allow 2-way conversations amongst a variety of groups. These conversations should not aim at achieving a consensus but to kick start and continue discussions over time as to what developments would benefit the locality overall, by airing and challenging the views of groups and individuals holding different values and needs. The role played by elected members (in Community Councils and LPAs) as well appropriate scene setting and reporting would be crucial for a progressive conversation that has both technical and political relevance on what entails public interest locally.

2.4 Enable communities.

Relevant issues: Bottom-up vs. top-down, empowerment, community resources, depth of engagement, inclusiveness, ongoing process

Key findings: The opportunity to meaningfully engage with development empowers people to have an impact on their built environment and will lead to better placemaking in time. In order to link planning with the making of better places for people, Place plans are key. Many community councils and community groups need funding, skills and resources to facilitate engagement that provides added value. Such investments pay dividends.

When the public is not engaged effectively, dissatisfaction developed locally over time generates emotive phrases like ‘marginalised’, ‘forced on’ and ‘views of the residents affected were completely immaterial’ emerge.

In the fieldwork, community representatives referred to ‘people power’, ‘having a voice’, ‘a real sense of achievement’ and feeling ‘empowered’ has generating interest and enthusiasm to think of ways forward. This was echoed by a Community Council informant where the preparation of a Place Plan had recently been completed; the exercise – through which the Community Council had built relationships with over 50 community organisations attracting new funding – created a real ‘buzz’ in the town and an openness calling for further joint work in the locality.

“Place Plans create a sense of community ownership and responsibility.”

(Community Council)

An LPA Officer suggested that empowering communities may require the ongoing support from a variety of stakeholders, particularly LPAs, and an architect suggested that the role of the developer should be as the facilitator of the public’s expression. Place plans, when well conducted can provide the link between planning (i.e. LDP production), development management (i.e. Pre-application and application consultations) and effective decision making on place making. More understanding of what Place plans are achieving on the ground and their links with planning is needed to develop ongoing practice in Wales.

A specific point was raised about the challenge of engaging big numbers and then ‘whittling down comments’ i.e., analysing the data produced from engagement activities, and aligning with planning policy etc. This is a resource intensive exercise requiring specific skills.

In addition, an LPA Officer noted that following an engagement activity, it was necessary for members of the public to submit a formal representation, the production of which can be challenging for individuals. One Community informant reported that an engagement process they conducted had been cost-effective and provided ongoing benefits, beyond plan preparation. The evidence gathered for the preparation of the local Place Plan had then been used to secure grant funding for local projects.

“Community councils are voluntary organisations and do not have the resources to access large numbers of residents.”

(Community Council)

Community groups and councils, particularly in smaller communities, would benefit from additional resources to support specifically planning expertise and spatialised projects to facilitate meaningful engagement activities themselves that add value to planning processes locally and within their local authority.

2.5 Connect specialist and local knowledge

Relevant issues: Community resources, creating understanding, knowledge exchange, using existing networks, common information base.

Key findings: Reciprocal exchange of knowledge through engagement benefits all stakeholders and adds value to planning processes and planning outcomes.

Engagement provides an opportunity for the public to contribute local and specific knowledge to projects, particularly at the plan-making stage, and for the public to gain knowledge around those projects. Likewise, engagement is an opportunity for experts to share technical knowledge with the public. A Community Council highlighted that the knowledge gap between professionals and the public should not be a reason to discount their views.

An LPA Officer suggested that engaging at an early stage is an opportunity to counterbalance the professional viewpoint of a proposal.

Local people often know their place best. LPAs can use this knowledge as part of its evidence base when developing plans. In addition, localities where a Place Plan has been produced have provided their communities with the opportunity to review their area in a structured way and gather evidence to form a vision and aspirations for the future that more easily feeds into more structured engagement moments within the planning and development management process.

“By inviting a range of stakeholders with various specialties and local knowledge, a vast range of issues, opportunities and examples was identified more quickly and with greater detail than could have been achieved by individuals from our project team conducting site visits and online research.”

(Planning consultant)

A planning consultant mentioned that an engagement activity opened up other specialist stakeholders to new ideas and gave an example of an engagement activity which would have benefitted from having adequate time for the public to share their knowledge fully.

There was cross-sector agreement that it is important to think about engagement not just in terms of local communities but also of communities of interest. Engagement methods need to encourage these groups to make themselves known and actively participate.

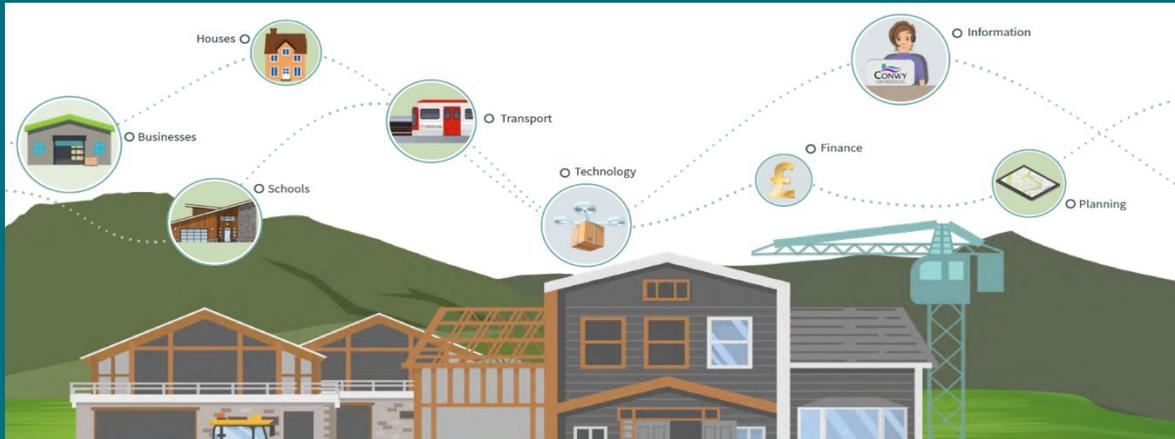
An LPA acknowledged that, had they involved communities of interest more proactively, the types of response they received to their engagement exercises may have been broader. A planning consultant suggested that the involvement of those with specialist knowledge is more beneficial than their own team conducting research and site visits, alluding to a benefit in terms of resource efficiency.

Overall data from the field stressed the role of local communities and communities of interest in providing knowledge that would not otherwise be accessed. Communities of interest particularly will have an understanding of specific issues, and how they develop locally, that would cost time and money for the public sector and the developing industry to take to the table. Their inclusion through effective 2-way engagement adds value to the planning process. The strength of their role could be amplified by solid Place planning experiences which increase the ability of communities to engage with statutory planning.

“The local community came together to make their views known during the consultation, and we believe the development company were shocked at the volume of the local reaction, as well as the response from local ecological organisations.”

(Community group)

Case Study: Planning Policy Engagement in Conwy



Background

Conwy County Borough Council's planning policy team are committed to delivering the best forms of community engagement they can within the context of limited resources and time. They have trialled a range of approaches to engagement activity and are reaching wider and previously unheard from audiences in their authority area. They have encountered some challenges in using these approaches, but overcoming them and addressing them in planning subsequent exercises has helped refine their approach. Conwy also have a permanent *Strategic Engagement and Place Plan Officer* as a member of their planning policy team. This officer is a non-planner from a community development background and appears to be the only dedicated Place Plan officer in Wales. The rationale for creating such a role, the advantages it brings in terms of community engagement on planning issues and the challenges of resourcing the role were explored further in an interview with the officer and the head of the planning policy team at the authority.

How is engagement approached in Conwy and where is the value?

In many respects, Conwy's approaches to community engagement on planning matters is not radically different from other planning authorities; statutory consultation notices are issued, documents are put on public display and in addition to minimum requirements, drop-in sessions are provided and topic-specific meetings are held with all types of stakeholders, including with those from hard-to-reach groups.

However, there are some nuances in approach and some underlying principles that have helped Conwy generate wider interest:

- Engage as early as possible. Conwy adopted this principle having learned through experience, highlighting that there are more opportunities for community views to be taken into account and help shape plans at earlier stages. Communities can become disenfranchised when they identify they haven't been engaged at the earliest opportunity. Early (and ongoing) engagement, particularly in strategic site planning, is now considered highly valuable in building trust (and 'buy-in').
- When engaging early, be clear about what could (and cannot) be achieved, but also try to visualise potential options to capture people's imaginations.
- Local knowledge is as useful in designing the engagement approach as it is in comments on plan preparation. Prioritising delivery of engagement activities in places communities actually used (such as community centres) rather than traditional 'town hall' style venues had proved successful.
- Use social media 'brokers'. Rather than relying exclusively on the local authority's own social media pages, community councils / groups were invited to share posts about the LDP on local community noticeboards and 'gossip'-style pages; this allowed a broader reach to be achieved. This example again used local knowledge in delivering engagement.
- Communicate clearly and concisely in an engaging way. Conwy produced animated 'explainer' style videos on their LDP, which generated wider interest and comment.
- Extend minimum consultation periods and give people time to come back. Conwy routinely extended the six-week minimum consultation window on their LDP, delivered drop-in sessions at the start of the window and returned a month later; by introducing the proposals and allowing people time to process it, they found people returned with more questions and generated better quality comments on the plan.

Crucially, having a dedicated community engagement officer in-house within the policy team is considered vital to provide and bridge local knowledge, maintain continuity across different engagement exercises, provide meaningful feedback on planning issues and build and maintain trust with communities. Having an officer from a non-planning background in-house generates different ideas and a fresh perspective in designing engagement activity whilst retaining a focus on strategic matters that might not be possible when using wider authority or external engagement personnel. After having developed the role over two-three years, Conwy is now turning its attention to supporting its community and town councils and the wider community to develop Place Plans in five strategic areas. Their first step is to deliver training to members, officers and community representatives on Place Plan preparation.

How is the community engagement role resourced?

It is important to emphasise that the role was incorporated into the planning policy team after internal restructuring. The planning policy team was moved into a different directorate that had community engagement officers. Later, the policy team was returned to the planning directorate and the role was retained (with some persuasion), as the value of the role was recognised. Subsequently, the community engagement team was disbanded and retaining the role can be challenging. Ultimately, the policy team can evidence the value of the officer in question, but it was emphasised that the designing and procuring a budget for a new role might have been much more difficult.

What are the challenges / lessons learned?

- Engaging for an appropriate length of time whilst striving to meet LDP production timeframes can be a balancing act.
- Going beyond the 'bare minimum' at the earliest stages; it is more difficult to engage people 'with a blank sheet of paper', but visualisation helps.
- Engaging at the right level of technical detail; communities can be put off by overly complex interventions, but at the same time need a meaningful level of detail in order to participate.
- Ensuring communication graphics and videos are engaging without leaving the audience feeling patronised; short summaries can yield better results over 'easy read' style documents.
- Ensuring emphasis on strategic matters rather than grass-roots community development work; inevitably, the trust established with such an officer can result in non-planning matters being raised. The absence of the non-planning engagement team is felt; in an ideal scenario, the planning engagement officer would be able to work strategically with engagement officers with a wider remit.
- Resourcing a dedicated engagement officer despite the value the role brings.
- Ensuring the community perspective provided by a non-planning officer is consistently represented / considered in planning matters.

Theme 3: Engagement as a technical and political activity

3.1 Enable elected members.

Relevant issues: Role of elected members, technical vs. democratic exercise, bottom-up vs. top-down.

Key findings: Elected members should be encouraged and supported to play a more active role in engagement in planning matters.

Supporting findings from our review, one LPA Officer highlighted that perceived conflicts of interest may dissuade councillors from participating in engagement activities whilst a Community Council informant suggested that it should be mandatory for community representatives to participate in engagement activities.

“It should be made clear to all community representatives that it is their duty to attend and participate”

(Community Council)

Many service users have over the years raised this concern directly to Planning Aid Wales; in some instances, LPA members have turned away their own constituents citing predetermination, which is a fundamental misunderstanding of the intent of rules around local government codes of conduct.

The literature review identified that there is a growing disconnect between the technical process of engagement activity and the involvement of local politicians whose democratic mandate is to represent their communities; the fieldwork upheld this view. It is possible that LPA members are unclear on their role and specifically unsure about their role in respect to planning; one community council suggested that *‘our county councillor didn’t understand what engagement is.’*

A systematic, coordinated programme of planning (and engagement) training for elected members at all levels of government has yet to be fully realised and our findings put it squarely back on the table. There is also scope for the preparation on specific guidelines on accepted and desirable behaviours from elected members, maybe framed under ‘do’s and don’ts’, at each stage of statutory engagement.

3.2 Taking stock and developing practice around Place plans.

Relevant issues: Communication, trust, community empowerment, creating conversations not consensus, depth of engagement.

Key findings: Place Plans may bridge between Place making and overarching plans and policies.

Producing planning documents that are in accordance with national planning policy is one of the guiding principles of the development plan system. One LPA Officer mentioned that identifying sites under national planning guidance may conflict with local opinion and that the coming Strategic Development Plans (SDPs) may present similar challenges; early and meaningful engagement by LPAs when considering and selecting such sites as part of SDP preparation will be crucial, even if challenging.

Place Plans may present the single best opportunity for linking ‘bottom-up’ planning in Wales with existing and emerging planning policy, an approach that would be beneficial at all levels of planning policy development. Communities can work collaboratively to produce a planning document that could be adopted as Supplementary Planning Guidance (SPG) if it is in accordance with policy. One LPA Officer suggested that Place Plans are a means of linking together engagement and policy by enabling stakeholders to share views and develop, organize and prioritise shared goals for their locality.

“Bottom-up engagement can lead to a conflict with strategic development and national planning policies.” (LPA Officer)

Vs.

“Our Place Plan has been developed with the community and the LPA, in accordance with policy and brought a wide range of benefits” (Community Council)

Our case study of Newtown & Llanllwchaiarn Town Council have recently completed their Place Plan, which Powys County Council are now putting forward for consultation as SPG. This was as a result of careful but ongoing collaboration between a wide range of stakeholders including the Town Council and the LPA and it is unquestionable that a range of benefits have emerged as a result. Ultimately, it appears that a carefully considered and managed exercise has the potential to overcome concerns over potential conflicts with the development plan system.

Looking at Place plans from this angle, they have a role both as completed document and as a process ‘training’ participants to organize their ideas in ways that could more easily interact with the planning system. Place plans making the effort to connect to planning process also with timeframes might enable a clearer link and joined-up approach to engagement throughout the planning process.

This said, it should be recognised that even though the Place Plan system has been in place for over five years and over 865 community councils / community areas are eligible to prepare them, very few (<30) have been prepared and even fewer have been adopted as SPG (<10). Our data supports a cautious approach. An LPA Officer highlighted that in one instance a Place Plan was not adopted as SPG but would be considered in a future LDP and another noted that Place Plans can be overlooked in the development management process. Likewise, a community council gave an example of a place planning process where they found it difficult

to reconcile the outcomes of engagement outcomes of engagement with the council's expectations.

At this stage it would prove helpful to comprehensively review recent practices around Place plans – particularly in respect to their spatial content and their role in simplifying community access to statutory planning setting - and to ascertain the reasons behind some apparent successes and the many barriers encountered.

3.3 Avoid tick-box exercises.

Relevant issues: appropriate engagement methods, agreeing a process, conversations not consensus, managing expectations, negative bias, honesty, trust, need for legislation.

Key findings: Opportunity to add explanatory notes, checklists and guidance as to what makes engagement meaningful via presentation of the added value it provides to the process.

There was a consensus emerging from our fieldwork across sectors that some engagement is carried out purely as a technical step in the process, often referred to as a 'ticking a box' exercise, rather than as an opportunity for a meaningful democratic activity. This view was voiced by LPAs, planning consultants, CTCs, and individuals.

"Engagement events are often seen as a 'tick box' exercise where the developer tells the community what they are going to do."

(Planning Consultant)

Multiple stakeholders remarked that in pre-app consultations particularly the developer has a high level of control over the type of engagement activities to undertake and that often the prevailing approach is one to 'tick boxes'.

However it is difficult to point fingers to specific 'culprits': one LPA Officer highlighted that LDPs tend to produce detailed propositions for large key sites, which removes the ability to engage the community at an appropriate stage on this issue, raising the importance of carefully timing engagement before detail is developed. To an extent the way the planning system has developed contributes to making 'ticking boxes' approaches prevalent irrespective of specific actors' inclinations towards engagement.

Since all informants in our research, in all methods, seemed to see value and merit in well designed engagement processes, it might prove useful in the medium term to enrich current statutory requirements with examples, checklists and guidelines as to what makes engagement activities meaningful and worth pursuing as they provide added value.

Opportunities to celebrate and raise awareness of good practice amongst developers and the public sector as identified elsewhere in this report should be explored as incentivisation in the short term. Reviewing legislation and policy in the future may be necessary.

3.4 Overcome negative bias.

Relevant issues: appropriate engagement methods; communication; role of LPAs, promoting engagement activities; negative bias.

Key findings: Negative bias, hindering meaningful engagement, emerges from perceptions held from all stakeholders on each other.

It is a predominant view that the public engage in a negative way: by objection, being anti-development, and at the extreme just 'wanting an argument'. One Planning consultant suggested that engagement following minimum statutory requirement alone is negative by nature as those that are neutral or supportive tend not to respond.

An LPA Officer supported this by suggesting it is those with the strongest, usually negative, views that get their point across, which can dissuade others from voicing alternatives or even mediate. Another LPA Officer highlighted that we are at a stage where past events and negative coverage in the media as well as political approaches predominant in the past decades in the UK attached negative connotations to the term 'planning'.

Whilst a Community Council suggested that people will sometimes object as a form of protest against the process, this report has identified and presented in the previous sections potential wider systemic reasons.

The planning profession of course recognises that there is great diversity in the public's views on planning matters which are not always negative. It has been Planning Aid Wales' own experience that on some occasions, people simply do not realise that they can support a planning application as well as object to it. This may support the contention that the nature and form of consultations commonly undertaken facilitate negative bias, or at the least limit the potential for support. To some extent, negative perceptions of the public on the part of professionals tasked with engagement could also perpetuate this bias, as can an emerging insecurity on the part of the professionals in respect to the choice and use of appropriate methods. Limited resources dedicated to engagement also impact on this.

Better training for officers might improve negative perceptions from all sides and overcome negative bias. Positive and constructive voices can be used to reach the silent majority: one LPA Officer suggested that good engagement can create a core support of strong positive voices that will then spread within a community; such voices can become champions and engage as catalysts to spread hopeful messages beyond their own communities.

"Planning consultation is often a negative process where people only comment when they have an objection. People who support an application or are neutral simply do not respond."

(Planning consultant)

Case study: Empowering the community in Grangetown



Background

When a resident of Grangetown asks “*where can you get a coffee in the park*” in 2012 – nobody could foresee the exciting project that would follow.

Aims of the project

Grange Pavilion is a **partnership** project between residents’ group Grange Pavilion Project, Grangetown Community Action, Cardiff University and Cardiff Council to redevelop a previously vacant bowls pavilion into a top-quality community facility.

What did they set out to do?

Engagement has been at the heart of this project from the outset. Exploring what the community wanted to be included in the original brief and how they wanted spaces arranged led to a number of engagement techniques being introduced such as mind maps, modelling and testing projects within the existing building.

Dan Benham Architects engaged closely with the Grangetown community to get their views on the design – the designers needed to know how the building would work for them. Early in the process **positive dialogue** was set up with Cardiff Council Planners. The vision was explained and being sited within a listed park – sensitive design was paramount. Communication between the LPA and designers led to **trust** and a way forward through the planning process.

What is of value?

Between June 2016 and November 2018, Grange Pavilion brought together more than 3,000 residents, was used by over 100 stakeholders, and launched 150 community-led initiatives in response to community-generated ideas resulting in over 1,000 sessions/activities on site. Many projects have formed from this engagement including the Grange Pavilion Youth Forum, a Girls’ Hub, reading sessions, Friends and Neighbours meetings. The planning engagement work made a real difference in the

planning outcomes of the project as it allowed constructive conversations between the community and Planners and allowed the scheme to be designed in a way that would suit the community for example how internal and external spaces were designed. In addition, a sympathetic and distinctive design was proposed that tied in well with the listed park setting – taking on board comments from the community.

There was a massive growth in consultation and engagement with this project where alternatives were presented. Dan Benham explains “*you will lose people in the process if you don’t engage – if people feel part of the project – they will buy into it and will stay with it until the end*”

This project shows that there needs to be a flow of communication that follows the initial engagement – people need to know why their ideas and comments may not be able to be taken forward – **feedback** is vital.

Dan Benham says “The building is all about people. When the building was finally built – it was their building – the community owned it. Every project is about people”

Whist in conversation with the design team at Dan Benham Architects – the concept of improved conversations between Architects and Planners and having **Design Champions** within planning departments was raised as an idea for future collaborative working in Wales. Architectural roles within planning departments have been lost and this was felt to be an important element to be re-introduced – particularly at senior leadership level.

In addition, empowering designers / Architects across Wales with **case-studies** – showing the best of what can be achieved in Wales was promoted.

Summary

The Grangetown project is a successful example of engagement and partnership working which ultimately results in a building that **enables**, gives opportunities, and lies at the heart of a community.

Lessons learned:

- Early communication between designers and LPA
- Introduce innovative engagement techniques - the community will stay with the process until the end with limited drop off
- Continual feedback through the engagement process necessary
- Design Champions within LPA’s and Architectural expertise
- Promote the use of good practice examples from Wales and Europe
- Allow small design teams to be included in LPA frameworks – to bid for work

For more information: <https://grangepavilion.wales/about/>

Theme 4: Decision-making and transparency of outcomes

4.1 Make feedback and reporting more prominent and insightful.

Relevant issues: Trust, inclusiveness, jargon, transparency, role of LPAs.

Key findings: There are opportunities to improve feedback and reporting to engagement participants and further research should be undertaken to understand how to better report after each engagement episode to build (added) value over time.

The lack of feedback feature prominently in our data as a unanimous concern for community councils, community groups, individuals, youth groups and a planning consultant.

Each of the above groups stated that the results of engagement activities and planning decisions need to be fed back to them. A developer acknowledged that feedback is a key part of the engagement process and were careful to ensure that they did so. Similarly, a planning consultant stated that the importance of feeding back should not be underestimated. A planning consultant raised an issue where records were not kept adequately during engagement activities and so input was lost; this report has elsewhere emphasised the importance of continuity of recording engagement activities over time as subsequent steps.

A Town Council informant raised the question as to how the impact of engagement activity itself is measured and reported upon and an individual expressed that engagement activities should be measured and evaluated in a reportable way. Engagement reports tend to focus on numbers of participants, geography and issues raised without necessarily reflecting on the potential lasting effects of the engagement activity itself. One LPA Officer stated that they do undertake stakeholder analysis after consultation, but whether such analyses are i) published, ii) made prominent or iii) fed back to participants is unclear and practice is likely to vary between LPAs.

Reporting back to participants is emphasized in the literature as having substantial bearing on the development of trust; people will feel they have been ignored if information on how their input has been considered is not fed back to them using clear arguments and plain language. In Planning Aid Wales' experience, members of the public are at present mostly completely unaware that officer's reports and consultation responses are publicly available to view.

Mechanisms to provide feedback exist at most levels within the planning system: consultation reports are published on national policy and Local Development Plans, the Pre-Application

“You have to take people with you and publish results and outcomes so that people can see and hear what has been achieved. No feedback, especially to people who have contributed, is bad mannered and disrespectful.”

(Community council)

Consultation process requires a consultation report, planning applications require the preparation of committee and delegated reports, and appeal decisions are summarised in Inspector's reports. However, our findings suggest that:

1. Participants are generally not made aware of the existence of such reports in a consultation / engagement activities.
2. Respondents are not directly notified when such reports are made available.
3. The content of the reports are not written in a way that is easily understood, or where it is possible to track the decision-maker's response to the comments people have raised. Additionally, the fact that non-planning comments are automatically excluded can be frustrating for respondents who are unaware of technical matter.
4. In addition, reports are currently not required to link and refer to precedent and future relevant reports, leaving citizens unclear as to where they stand in respect to decision making

Solutions 1 and 2 above could entail ensuring inclusion of descriptions of how feedback will be provided to be added to all engagement / consultation communications and a subscriber-type electronic notification procedure incorporated into online consultation submission systems – i.e., when people submit a response, they could tick a box that says, *'notify me when a report is published'*.

Overcoming issues number 3 and 4 above appears more challenging; planning reports are written generally to rationalise issues in an objective manner and are not necessarily intended for general reading. Consultation reports could be more useful, but general summaries might not reference an individual's concerns and appendices tend to comprise long, densely packed tables of information, through which it could be hard to locate specific issues raised and the relative decision-maker's response. Ultimately, whilst a tailored note (or better, a conversation) with a respondent would provide the best solution, it is recognised this would be impractical (particularly at scale). Further exploration of this challenge, and particularly a) how reporting could be structured to link subsequent engagement episodes and providing signposting to participants as to their position along the decision-making process and b) highlight the added value brought about by meaningful engagement is therefore warranted.

4.2 Build trust with honesty and transparency.

Relevant issues: Trust in process, trust in stakeholders, honesty, feedback & reporting, negative bias.

Key findings: Trust could be fostered and tended to by enabling participants to orientate through a transparent joined-up route through engagement called 'Place-planning'.

Informants from the public/Community Councils stated that they did not trust the planning system to act on their input, or even in their interests. There was agreement amongst non-planners that lack of trust was caused by a sense of being ignored; a Civic Society informant highlighted that they have no evidence their views are considered in the decision-making process and assume that the content of their representations are mostly completely ignored.

"The consultation process was undertaken to seek the views and opinions of the community, which did not appear to influence the decision-making process in any way."

(Community Council)

Two Community Councils representatives, one LPA Officer and a community group informant suggested that this held perception of being ignored reduces their motivation for further engagement.

Others felt that planning will reach its outcomes inevitably regardless of their input and one third sector organisation informant suggested they had been 'left out of the loop' by an LPA, despite assurances to the contrary.

On the other hand, one developer highlighted that they feel that people will object on principle rather than on the basis of detail; whereas an individual felt that developers only make the minimal contact they are required to do (in so doing tending towards a more broad-brush approach, with little detail). Likewise, a Community Council informant suggested that in a specific recent project they were engaged with they sensed that developers were trying to 'push things through' the system.

Some exceptions notwithstanding, however, mistrust was more commonly targeted at the system itself, and by proxy at the LPA and planning officers therein, rather than the developers or other stakeholders directly. This might be engendered by the way engagement is commonly handled and the cleavage between technical approaches to engagement vs political representation.

In respect to the system, several participants felt that Developments of National Significance, the Pre-application Consultation process and planning appeals set – cumulatively - a low bar with regards to standards for engagement, and a community group expressed strong feelings of unfairness over the lack of third-party rights of appeal.

There is evidently a great deal of mistrust within the planning process, to an extent this is aimed at other stakeholders but is most likely channelled towards the LPA (as the decision-maker) and more generally public administration. As this is primarily a view of members of the public and their representatives, it is difficult to make a case for proactive engagement to them when they have had previous personal direct negative experience.

“The developers clearly did their best to ensure minimal contact with the community, most of whom were unaware of the proposed development until only a couple of weeks before the deadline for objections.”
(Individual).

The sense of feeling ignored can be reduced by showcasing honesty and transparency in public administration in raising understanding of the scope of the process, better communication and expectations management actively practiced from the outset, as well as enabling participants to orientate in a joined-up route through engagement linked to Place plans. This route through engagement can be called ‘Place-planning’, linking procedurally engagement in planning conducted at national, strategic and local level to the more physically oriented and small scale, localised Place-making agenda.

4.3 Enable Local Planning Authority Officers.

Relevant issues: Role of LPAs, LPA resources, clarity of process.

Key findings: Some LPA Officers were unclear of their role in an engagement process and unsure about methods beyond the few routinely used. Even where there is a will to engage resource and time pressures limit space for innovation.

In our fieldwork, acknowledgements often came from LPAs on – however important engagement was perceived – the lack of resources required to enact it effectively. One officer noted that engagement work is usually outsourced to consultants due to shortage of internal staff. Another Officer mentioned that they cannot afford long examinations for LDPs, even though more meaningful (and time-consuming) front-end engagement might reduce costs overall. In the face of widespread penury, there were examples of creative approaches towards resourcing engagement activities: Conwy CBC have been able to employ a Place Plan / Community Development Officer and this role is paying dividends (see case study).

“The community don't know how to engage fully, but I think it is partly the duty of planning teams to help people engage.”

(Third sector)

As found in the literature review, technical procedure and performance targets currently take precedence over meaningful engagement. The 50% reduction in LPA resources in the past decade in Wales has inevitably had an impact on their ability to deliver meaningful engagement. This has been exacerbated by the introduction of centralized contact centres for Local Authorities, which has distanced LPA Officers from the public.

In addition, it should be noted that engagement and participation skills do not form a core part of a planner’s training and this ought to be addressed through training. Perhaps more of a

concern lies with one LPA Officer's suggestion that they do not know what their role in an engagement process should be and a generalized sense from respondents that a lack of familiarity with methods and approaches (beyond the few routinely used) might be widespread in the sector. A systematic approach to assessing engagement skills and dedicated resources available in LPAs and providing tailored training may be necessary.

4.4 Agree an engagement process with, not for stakeholders.

Relevant issues: agreeing a process, trust, range of methods, timing, low interest.

Key findings: Co-production of engagement activities can improve numbers and diversity of participants.

Data showed consensus in favour of better management of expectations for all stakeholders, and in particular expectations held by the public, in order to foster trust, keep engagement activities focused and add value.

Expectations management can be effectively supported by co-producing an engagement process with stakeholders (as opposed as for stakeholders). Data gathered in fieldwork, supported by literature, suggests that varying the method, location and time of day / week within a programme of engagement activity allows for greater attendance and participation and – to an extent – a more varied representation. An informant reported that a Community Council invited a planning consultant to meet with them to clarify and discuss a pre-application consultation; in attending, both parties found the activity beneficial in sharpening the activities conducted, and the subsequent application was straightforwardly approved.

*“Ask the public what they want / their ideas of the LDP consultation process and how they feel is best to involve them/engage with them throughout the process.”
(LPA Officer)*

vs.

“Only 12 people attended a Delivery Agreement event we arranged.” (LPA Officer)

Co-production and advanced agreement as to the nature and type of engagement may improve participation numbers and diversify the audience. It is also important to discuss in advance specific parameters, such as geographical limits, and that – through co-design - stakeholders understand their role in relation to each other.

This principle extends beyond members of the public as interviews highlighted that, in projects with multiple public bodies collaborating, misaligned expectations between those bodies (and sections/divisions within the same authority) can impact on the value of engagement and ultimately on effective decision-making.

Case Study: Newtown & Llanllwchaiarn Place Plan



Background

With their Community Plan soon to be out of date and with significant development taking place in Newtown including a new by-pass and health campus, Newtown & Llanllwchaiarn Town Council aspired to engage the community and influence future planning decisions with a Place Plan.

Aims of the project

The Town Council worked in partnership with consultants Planning Aid Wales and Place Studio to develop a plan that will give local “Newtown” detail to the Powys Local Development Plan (2011-2026)

What did they set out to do?

From day one, the Town Council aimed to work closely with the local community to get their views on land use and other well-being issues that were important to them and to use this evidence to support the plan. Innovative engagement techniques were adopted to start a “conversation” with all those with an interest in Newtown’s future. Powys County Councils planning policy team were involved early in the process and actively encouraged the Place Plan with funding from the Councils Regeneration Team aiding implementation.

What is of value?

Between January 2019 and January 2021 - 321 people attended events, 106 people responded to an online survey, 48 local organisations were active in the project and 7000 comments were provided. 11 events were held with 10 stakeholder meetings taking place. The successful engagement phase informed the drafting of the Place Plan policies during 2019/20 with the Town Council adopting the Plan in Autumn 2020. Powys County Council has undertaken formal public consultation ready for final adoption and publication of the Place Plan Supplementary Planning Guidance in Summer 2021. The Town Council’s vision to empower the community has been a success and the desire for Newtown inspired policies becoming “material considerations” within SPG will come into fruition if the Place Plan is adopted as SPG.

The Place Plan “Our Town, Our Plan” sets out a vision for the place that Newtown aims to be by 2036 and covers three main themes: a) Newtown – a great place to live, learn and work, b) Green Newtown and c) Destination Newtown The Plan clearly explains that “every policy and project in the plan is based on suggestions from the community.”

The Place Plan process has had many benefits including a sense of gained planning knowledge locally and enhanced working relationships between the Town Council and County Council. The Plan being the first in Powys has raised the profile of the town and as Richard Edwards, Lead Councillor explains, Newtown is now seen as “*a place to do business*”.

The Place Plan outlines a clear steer for future work and can be used as evidence to attract external funding. Sorelle White explained “*Providing evidence of community need is often at the heart of bids for public money – with good reason! The evidence gathered for the Place Plan has been used in 4 funding applications to date. 2 of those have been successful. The Place Plan evidence undoubtedly strengthened these applications*”. To date, the evidence collected as part of the Place Plan project through public consultation has led to a number of successful funding bids including £500k Welsh Government Green Infrastructure and Biodiversity funding and £675k Welsh Government Green Recovery Circular Economy Funding. A £200k bid has been made to the UK’s Government Renewal Fund to deliver on a number of green recovery projects identified in the Place Plan.

Summary

The Newtown Place Plan is the first official plan in the Powys Local Planning Authority area to be considered for adoption as SPG and is the result of successful engagement and partnership working at all levels. It represents a local sustainable Placemaking approach as prescribed by Welsh Government. The Place Plan brings a local level of detail to the County Councils LDP and will be considered when the LDP is reviewed from 2022. This will help inform and shape how the replacement LDP applies to the Newtown area.

Lessons learned:

- At the outset enter into a “conversation” with the local community.
- Be clear on scale, costs & how the Place Plan will fit with other plans.
- Early communication and engagement with the LPA is essential.
- Consider a steering group.
- Good contacts & liaison required with local community groups
- Continual feedback during the engagement process - online newsletters, website updates
- Evidence collected during the Place Plan exercise can be used for funding applications by a range of community stakeholders.

For more information: <https://newtown.org.uk/consultations/placeplan.html>

Theme 5: Certainty of process and outcomes

5.1 Make the process smoother.

Relevant issues: Make the process clearer, agreeing a process with stakeholders, honesty, managing expectations, communication, added value of engagement

Key findings: Certainty of engagement processes support efficient and smooth decision-making, adding value and avoiding risks related to ex-post legal challenges.

A clear engagement process might support certainty of process for all participants. Certainty of process will be supported by a clear route through engagement whereby all participants know what is up for discussion at each specific stage, what each stage should achieve and give a clear idea of times and implications of and for engagement. Time and a clear direction are valued by all participants according to our data, which confirms findings from the literature.

Engaging is difficult and time-consuming for citizens, public administration and the development industry alike. We have seen how costly engagement is for LPAs, particularly after austerity-induced cuts. For the development industry any delay might result in unexpected costs and management adjustments. In places where proactive engagement practice is more established, developers are beginning to recognise the benefits of engaging effectively, so culture is changing. In addition, clear routes through engagement, well designed and well documented reduce the risk of judicial review which impacts considerably on developers' ability to plan and manage resources effectively and timely.

Our data suggests that a smooth process is favoured by most over a 'bumpy' and difficult engagement process. An LPA Officer stated that 'true' engagement generally results in a smoother planning process for everyone. This was echoed by communities and a planning consultant. However, the planning consultant suggested a smooth process would 'speed up' the consultation, suggesting a focus on their part on efficiency of reaching a decision. This focus would not necessarily decrease the quality of engagement, or the perception of the outcomes for the community.

An LPA Officer voiced that PAC is effective in enabling a smoother process, however, community councils and a community group suggested that PAC, as well as other statutory requirements for consultation, do not facilitate a level of engagement that can expand possible outcomes for them, particularly given that the design stages are likely to be complete when the PAC is initiated. Some perceived this as affording a level of predetermination in the outcomes and hence the route through engagement should commence much earlier in the LDP making process and proceed to PAC and applications in a concerted and consistent way to add value (and not detract value, be it financial, managerial or temporal). Ideally, Place plans could be timed to accompany and support such a process. Whilst this example cannot be considered a complete picture of the state of the PAC process across Wales, these examples highlight a potential need for further investigation on the efficacy of that process.

"From mine and the client's point of view, pre-application consultation was a good way to think through the proposal and to consider which comments and concerns would arise from an external perspective before submitting the application."

(Planning Consultant)

Ultimately, co-produced engagement processes enabling reaching agreement on accepted outcomes in clearly structured timely fashion will make the planning process more meaningful for all parties.

5.2 Manage expectations.

Relevant issues: appropriate engagement methods; agreeing a process; communication; role of LPAs.

Key findings: It is critical that all stakeholders understand what is and is not possible in terms of the outcomes of each stage of engagement and that concrete measures are taken to support expectations management by LPAs.

Keeping engagement focus on the planning issues on the table and managing public expectations about the goals each stage of engagement can deliver was one of the strongest messages from the LPA and in general professional planners. To an extent, Community Councils shared this view suggesting that being clear from the outset about what can (and, importantly, what cannot) be achieved from each stage of engagement is essential to manage and reduce the dissatisfaction that members of the public feel over planning decisions. There is however also scope to manage other stakeholders' expectations: one LPA informant suggested planning officers' expectations should form on the basis of what a developer can deliver on a project.

This argument supports suggestions from the literature as well as chiming with Planning Aid Wales' own experiences of delivering training and advice to community groups: once people understand the scope of the planning system and how decisions are being made, they are far more likely to be satisfied with a planning decision, even when it goes against their wishes.

"Try, try and try again to emphasise that choices are unlikely to be open-ended and that engagement will be limited to finite choices." (LPA Officer)

Expectations management is strongly linked to how engagement events are introduced, how stakeholders are invited and how and when boundaries for conversations are established. One planning consultant, reporting past experience, suggested that in specific instances making the constraints clear before an engagement activity would have generated more focused discussion and comments. Other informants suggested clarity in respect to whose views would be taken into account was paramount: often participants are unaware that the input of statutory technical consultees will be considered alongside their own or that the public are playing a role in a process that incorporates processes and expertise outside of their involvement. Stakeholders across sectors highlighted that loosely structured engagement activities can capture an abundance of non-planning issues, creating additional work in having to filter out relevant contributions. Officers' remit in respect to this aspect specifically was unclear: one LPA Officer suggested that it is their job to point people in the right direction, whilst another went further in suggesting that consultations should invite open inputs, and subsequent filtering of relevant contributions should form integral part of the process.

Of critical importance is establishing boundaries at the outset, as many planning professionals and some Community Councils informants suggested, as introducing the reimits of the exercise at the end rather than the beginning might be perceived as a limitation and possibly

exacerbate tensions. Informants amongst Community Councils raised the issue of geographical clarity (e.g. what portion of land and/or specific area is the exercise going to cover).

Whilst LPAs and the profession are aware of the need to manage expectations, it is often difficult to see how this awareness is translated into practice. For example, development management communications tend to rely on statutory notices which do not establish the boundaries and limitations of consultation exercises – improving the clarity of notification letters, site notices and other standard communications would be beneficial. Comprehensive guidance on expectations management through communication could be developed and circulated in the medium term to overcome this issue and ensure consistency across Wales.

5.3 Create shared understanding.

Relevant issues: Added value, common information base, communication, community empowerment, depth of engagement, transparency.

Key findings: Building local knowledge and shared understanding are excellent examples of added value produced by meaningful engagement practice.

One of the core messages from the field is the lack of understanding of the public for the logics behind the planning system and the planners' unease in communicating the system's complexity easily. This complexity, coupled with obscure terminology, often used inconsistently, prepares the way for a variety of misunderstandings. The fieldwork found several examples of challenging communication between sectors:

"This Zoom meeting was very cordial – and [developer] gave the facts and everyone had the opportunity to talk."

(Community Council)

- One LPA reported that stakeholders were surprised to see large housing allocation in their area in a deposit LDP, despite having been present at an earlier stage. This may suggest lack of clarity/understanding of what was presented.
- A Community Council reported that communicating some aspects of the LDP that had already been agreed was difficult without a sound understanding of the planning system.
- Another LPA reported that – whilst ultimately an LDP must be sound - the public don't understand what is implied by the concept of 'soundness'.
- Another Community Council reported that a Place Plan steering group did not grasp the implications of the timescales around LDP development.

Misunderstanding of the planning process can be a significant challenge for parties involved and pave the way for 'urban myths': an LPA Officer felt that the public assumed by default that all decisions have already been made prior to engaging. Instead engagement, at its most basic level, creates opportunities for different stakeholders to state and explain their positions, helping in fostering shared understanding and knowledge: an engagement specialist found ongoing engagement kept them and the public aware, ensuring they had the correct information. An LPA Officer identified that engagement not only gives them an opportunity to present the reasoning behind their decisions, it also allows them to clarify aspects of the

development process itself; this has lasting benefits beyond the exercise in question in developing trust in the system and producing local knowledge and community cohesion.

Communication is key in enabling shared understanding and local knowledge to develop over time. Without question, there is a clear need for issues, ideas, strategies, and policies to be presented in a way that can be easily understood by a wide range of people. Improving the form (images, videos, animations) and language of communication would be beneficial. Care, however, should be given to establishing a 2-way channel of communication whereby local insights interact with technical and specialist knowledge as much as technical expertise is shared and openly discussed in a process aimed to add value not just to physical outcomes of the specific project on the table but also community cohesion and the development of local shared understandings. Practicing good engagement based on 2-way communication can help dispel 'untruths', support cultural change in localities and withstand misinformation.

5.4 Appropriate time.

Relevant issues: Time constraints, timing

Key findings: Time (and specifically alignments across Place planning) is of the essence for meaningful engagement.

The fieldwork returned a varied temporal landscape for recent engagement practices: some activities did not have long enough to reach satisfactorily engagement, whilst others went on for so long that there was a loss of focus and motivation. Two LPAs highlighted overstretched processes as an issue affecting particularly the strategic plan making stage, whilst a Community Council informant highlighted that a long process can potentially be disrupted by changes in personnel.

“The process lasted over too long a period of time due to local authority timetables / meeting schedules. This meant a drop off in attendance by community representatives and a change in both community and officers that badly damaged the continuity of ideas.” (Planning consultant)

On the other hand, statutory timescales could limit the potential to meaningfully engage: a Community Council suggested that the timescales laid out by an inspector are often insufficient to effectively mobilise and allow for added value to be produced in the process of engagement. Similarly, an LPA suggested that the statutory consultation periods are often insufficient for effective engagement. An interview mentioned fragmentation in terms of timing i.e., the outcomes of an engagement process conflicting with another study undertaken at the same time resulting in a lack of clarity over what took precedent due to insufficient guidance in respect to temporal issues.

The above contradictions dictate a need a) to recognize that time and timeframes are of the essence when aiming to achieve meaningful engagement and need to be explicitly clear; and b) to acknowledge and provide flexibility of approach for engagement that is 'fitting' its context and goals. Ultimately, co-producing and agreeing in advance a process with clear goals and timescales with stakeholders seems like the most promising route to a process that can add value.

Case Study: Pre-application consultation in Rhos-on-Sea



Background

An independent not for profit registered social landlord (RSL) wanted to develop 19 flats within a building within Rhos-on-Sea. A pre-application consultation exercise was undertaken.

How did they do it?

A pre-application consultation event was arranged – which was very well attended – with those attending able to make comments on plans on display and to have discussions with the RSL who were on hand to assist. *“at one-point people were queuing to go in”* (local Councillor)

What is of value? / What difference has it made?

The public consultation exercise was well attended with the local community having a chance to express their views. The event was held in a public building close to the development site. Concerns raised included highway and parking concerns, overlooking, overshadowing, number of units proposed and refuse collection issues. The desire of the community to retain the historic façade of the building was also raised at this stage. The overall opinion was that there were several issues to resolve prior to the formal planning application submission. However, communication between the developer and the community in the period between pre-application stage and the formal planning submission stage was lacking with limited follow up and feedback.

Summary

This is a pre-application project where a developer looking to develop a site within a local community that has historic value. To maximise potential of the site, the RSL has proposed 19 flats which local residents feel is over development of the site.

Lessons learned:

- The views of the community need to be taken forward to planning submission stage.
- Feedback and communication with those who attend the pre-application consultation event is essential with feedback on concerns raised.
- Developers involved in Pre-App consultation to keep the community aware of the stages involved – to let the community know when the application has been submitted, the changes that have been made and provide links to the PAC report.
- Early engagement with all parties to be held at pre-app stage – local resident groups, Councillors, CTCs to ensure everyone is made aware of all issues – open dialogue required and ensures trust between all parties.
- Welsh Government to consider a change in procedure – for a meeting to be set up with all relevant parties to meet and discuss all relevant issues prior to a pre-application consultation. Also, for all those that have made comments during the pre-application stage to have sight of the PAC report.

More information

Bay of Colwyn Town Council - <https://www.colwyn-tc.gov.uk/>

Theme 6: Costs and equity

6.1 Engage inclusively.

Relevant issues: Range of methods, use of digital tools, utilising existing networks, promotion of engagement, including specialist expertise.

Key findings: It is critical that using as wide a range of networks and tool as possible to ensure an inclusive engagement process.

Across all methods used, engaging in an inclusive way was a crucial issue raised in our fieldwork. Accessibility is key in terms of allowing individuals and groups of different age, geographical location, cultural & religious background, mental & physical impairment, and language to engage meaningfully.

Whilst excluding people from any backgrounds is rarely if ever intentional, it appears that it is currently extremely challenging if not impossible to tailor 'fitting' engagement activities varying the format, location, timing, accessibility, duration, language and style of engagement activities to the needs of a variety of groups. In addition, one LPA informants raised the issue that – whatever the setting and the thought gone into designing a specific event - many people may feel intimidated in attending and participating in consultations.

Specific comments have been dedicated to reaching out to the 'hard to reach' groups. Overall, there was wide acknowledgement that these groups are those that routinely miss out. In respect to fostering wider inclusivity, further guidance, training and support consistent across Wales would be beneficial. Using existing networks was suggested by informants to be of crucial importance, reaching out to representatives, organisations and gatekeepers. Also encouraging 'local champions' to promote engagement opportunities more widely was suggested as a way forward as was seeking tailored advice from specialist charities.

"People do not bother responding in a way that can be picked up using current consultation methods. If consultations were done in a more inclusive way then a larger number of responses would be achieved I would think."

(Planning Consultant)

6.2 Engage creatively.

Relevant issues: Inclusiveness, range of methods, appropriate engagement methods, agreeing a process, communication, including specialist expertise, sharing best practice, LPA resources.

Key findings: Creative approaches to engagement, using specialist expertise where appropriate, can produce more meaningful engagement in a resource-efficient manner.

From our data it emerged that for LPAs, the developing industry and the public alike engaging beyond the loudest voices and ‘usual suspects’ was important and being more proactive to engage children and young people was deemed a particular priority.

There was cross-sector agreement that using a range of engagement methods – beyond the handful currently routinely employed - is key in fostering inclusivity and it was recognised that specialist expertise might be required to support specialist activities focused on reaching specific groups. Creative approaches to delivering engagement need not be expensive, they might ensure more insightful outcomes in shorter timeframes and - by being tailored to specific situations - elicit added value on a variety of fronts: better physical outcomes for projects, more shared understanding, increased trust in the planning system and public administration. In addition, engagement activities can be creative and fun!

“Tailoring engagement to the audience can help to engage stakeholders e.g. make engagement more child-friendly with crafts/games where appropriate.”

(Planning Consultant)

A review of methods and cross-sector accepted guidance adapted to the context of Wales could provide a consistent basis for LPAs to dare more creative methods as well as highlight clearly when specialist external expertise needs to be harnessed.

6.3 Engage online, but with care.

Relevant issues: appropriate engagement methods, creating understanding, agreeing a process, communication, COVID-19

Key findings: Use of online engagement tools is a cost-effective way to broaden reach, and its potential and limitations for the Welsh context should be recognised.

In line with the literature review, fieldwork found that the use of digital tools was beneficial in terms of reaching broader audiences (e.g. younger citizens, working age groups, etc.) in a cost-efficient way, but its limitations, particularly in relation to engaging older people, the economically disadvantaged and those in rural areas with poor internet access must be recognised.

There was agreement across sectors that a combination of digital and face to face methods, designed to fit specific contexts is likely to be most effective in providing added value.

COVID-19 has had an impact on engagement processes by both delaying/hindering planned engagement activities and speeding up uptake of digital tools. Lockdowns have acted as a catalyst for different types of stakeholders to familiarise themselves with a range of existing digital tools, ranging from generic social media to bespoke engagement platforms.

“The use of online consultation could have resulted in a larger audience contributing, as well as reaching a wider variety of stakeholders including younger people and hard to reach groups.”

(Planning Consultant)

Beyond caveats to using digital tools above, it is worth highlighting that i) skills, procurement and awareness of platforms may be lacking at present and 2) the quality of digital platforms and the quality of engagement they can deliver should be considered, regardless of whether they are effective in increasing take up for engagement. Further research on how online tools could serve the variety of contexts and territories of Wales would be beneficial in devising ways forward.

6.4 Build on existing networks.

Relevant issues: appropriate engagement methods, LPA resources, time constraints, communication, promotion of engagement

Key findings: Using existing community networks can be resource and cost-efficient, subject to appropriate communication.

The focus group and interviews highlighted the potential of using existing networks within communities to reach more people more effectively. Civic societies were mentioned by a planning consultancy as the ‘gatekeepers’ to engaging specific groups.

A developer specifically mentioned working with schools and colleges in order to engage with young people, something that a Community Council used particularly successfully in the preparation of a Place Plan.

It was noted that more and more networks exist online too nowadays, particularly through social media platforms. However, some experienced poor responses from engaging via some of these networks.

Community Councils in towns and more rural environment play an important role as gatekeepers to engage residents with planning issues and relations should keep on being fostered between LPAs and Community Councils as they have proven the most consistently successful so far. Building on alternative existing networks is particularly relevant in larger urban areas in Wales where Community Councils don’t exist. Personal links supporting communication, as well as using appropriate engaging messages were suggested as best practices – all more easily achieved when contacting existing groups with specific identities. More research, conducted by LPAs, could help to build a map of relevant local networks for engagement.

Case study: Green Infrastructure Action Plan, Pembrokeshire



Background

Pembrokeshire Towns: A Green Infrastructure Action Plan June 2018 has been produced by LUC, on behalf of Pembrokeshire County Council and Pembrokeshire Coast National Park Authority, funded by the WG Environment and Sustainable Development (ESD) Fund. It covers 11 towns.

Aims of the project

The aim of the Plan is to guide green infrastructure improvements within settlements, to be used by public, private and voluntary sector bodies to bring projects forward.

What did they set out to do?

This was a partnership project between two Councils with many Officers engaged from both authorities with the Ecology and Biodiversity Officers being the main contacts. The consultants LUC facilitated an engagement workshop with over 50 stakeholders attending to identify green infrastructure issues and opportunities within each of the towns. It also identified examples of successful initiatives and best practice. It was important to involve local representatives early in the process as they know their areas well and could advise the consultants with their local knowledge.

What is of value?

By inviting a range of stakeholders with various specialisms and local knowledge, a vast range of issues, opportunities and examples were identified more quickly and in greater detail than would have been achieved by individuals.

Early engagement allowed discussions to take place between stakeholders which identified further issues and opportunities. Competing ideas could also be looked at in greater detail.

One benefit of engagement that is often unseen is assistance with monitoring at a local level. After a project takes place (particularly a landscape project) there is real need for monitoring on the ground and this is where the community can assist. This is an example of real value in engagement.

Philip Smith, LUC suggests “With green and blue infrastructure projects that don’t necessarily have a delivery body – this is where the value of engagement can be seen – volunteers can often oversee the work and monitor”.

Summary

The Action Plan has ensured that projects have taken place on the ground and these have been a successful output. Expectations of what the Action Plan could deliver may have been raised at the outset with so many Officers and stakeholders involved and with many ideas coming forward during the engagement phase. The outcome is a project-based plan rather than a strategic plan.

Lessons learned:

- Important to define the scope of the project from the outset – so as not to raise expectations. Communication between all parties essential /
- Keeping everyone up to date during the engagement process – not just involving people at the outset/
- Important to think carefully about when to engage and start the engagement early if possible – get the local issues on the table early on in the process.
- Consultants / Planners do not necessarily know the local area – local knowledge is therefore very important – to get to know a place, its distinctiveness and identity.
- Do not rely entirely on one stakeholder event as certain specialist views may not be present.
- At an event it is difficult to obtain all views in a limited timeframe -- need to have an opportunity for further discussion / liaison after such a workshop. The use of additional online engagement may have improved outcomes to reach a wider audience, young people and hard to reach groups.
- Ensure a stakeholder event allows time for individual views to be expressed and guidance given on what is viable within the scope of the project.
- Taking contact details would allow follow up work with individual stakeholders.

For more information:

<https://www.pembrokeshire.gov.uk/conservation/green-infrastructure>

Conclusion & Recommendations

This research project has identified strong correlations with the themes identified in academic and professional literature. There is a saturation of academic literature on the topic generally, but it is limited in the Welsh context, which this report starts exploring with the hope to act as a catalyst for the development of more systematic reviews in the near future.

Six themes that tie the literature to Welsh experiences have been followed in the analysis. In respect to engagement in planning in Wales, the analysis shows that there are numerous opportunities to improve clarity and continuity, to make the process more transparent and a less technical exercise, to give greater certainty in process and outcomes, and ultimately to create a more equitable process.

There are of course examples of excellent engagement practice in Wales, but this should be tempered with the findings of the *Audit Wales* report. Our research has identified opportunities to address some of those findings, both systematically and locally.

The hierarchy of terms surrounding engagement are poorly defined and used interchangeably and it is challenging if not impossible to track engagement from one activity to another, a situation that can exacerbate community frustrations and perpetuate *ennui*. There are instances where engagement can be viewed as a technical step rather than a democratic exercise and the quality of engagement work is not formally reviewed or evaluated within planning procedure. A focus on technical process has created a disconnect with the positives of political engagement; elected members are increasingly disconnected from the process.

This research has found that value varies according to the perspective of the different actors in the system. For government, value lies in making decisions that meet the needs of stakeholders and communities. For developers, smoother process and certainty of decision is priority. For the small proportion of the public who are engaged in planning, value lies in clarity, certainty that their input will not be ignored, and importantly, democratic opportunity to meaningfully co-produce the places in which they live. Importantly, all actors agreed in supporting meaningful engagement practices providing added value to planning outputs as well as planning processes.

Ascertaining a quantitative 'value' from a financial perspective is difficult as it requires full disclosure of costs on the part of organisers, a difficult task in itself as it is often not possible to distinguish the direct and indirect costs of engagement activities. There is far greater scope to measure the value generated from time and finance invested in terms of *meaningfulness*, *judged on the added value the engagement process provides to the planning process*. In parallel with other recent work (RTPI, 2020), this report has found numerous instances of where good engagement practice can generate positive outcomes, for example:

- Reduced tension in the planning process. Good engagement practice can lead result fewer objections can mean a smoother planning process, less prone to legal challenges; building and maintaining better relationships between planners and communities is important.

- Increased awareness and knowledge of the planning system. Many examples in the fieldwork revealed that good engagement practice can increase the numbers of people participating and increased understanding can help overcome negative bias. Knowledge of the scope and limitations of the planning system is not only useful to manage expectations, but can create more focused, productive conversations. Also, knowledge is not a one-way street; local knowledge has value within process.
- Increased sense of civic pride and engagement as well as development of local knowledge and shared understanding underpinning a cultural change in localities. Good engagement can deliver a sense of ownership and interest in the built environment and can act as a catalyst for further involvement. This leads to cultural change and to the creation of better places.

At present, typically, reports on consultation activity seem to value quantity over quality with their focus on number of activities delivered, numbers of people participating and (importantly), issues raised and how they were considered. However, the latter comes with its own difficulties; whilst such reports exist, they are often inaccessible, both in terms of their location and content. Attention should shift to the quality of the process and specifically on its meaningfulness by systematically harnessing and appraising the added value it provides. Place-planning - as a coherent and continuous process extended in time aimed at appropriately involving citizens at all stages of decision making related to land and its uses - could provide the frame for this linking national and strategic planning through local planning processes to the Placemaking Agenda.

There is already a legal framework for change in existence to improve practice; the Well-being of Future Generations Act has begun to shift focus towards better engagement approaches. Developing this framework in the context of spatial thinking with the view of procedurally accompanying decision making at all levels with meaningful engagement to deliver placemaking may be all that is needed to deliver consistently meaningful engagement and add value to the existing process.

This research has been delivered in the context of the limited resources available to Planning Aid Wales and represents a culmination of staff efforts, hundreds of hours of volunteer time and the input of more than one hundred informants from a variety of sectors. The research has been broadly exploratory in an attempt to provide a snapshot of where we are at in respect to engagement in Wales rather than provide definitive answers. As such, this report should be viewed as a first rather than last step; there are many themes and topics that warrant further exploration, critique and evaluation as well as providing some pointers for action. The table below summarises and links findings and actions emerging from the fieldwork and analysis with recommendations for further actions.

Table 6: Linking Key Findings, Potential Actions and Recommendations

	Issues	Key Findings	Potential Actions	R. No.
Theme 1. Clarity and Accessibility	1.1 – What is engagement?	Terminology in law, policy and practice in Wales could be clearer and is reflected in informants’ views	<ul style="list-style-type: none"> • Further research on the use of terminology within the planning system. • Issuing new guidance to clarify terminology. 	R6(a), R6(b), R9, R10
	1.2 Clear and consistent policy	Existing policy and guidance on engagement in planning is fragmented	<ul style="list-style-type: none"> • Short term: Issue clear guidelines to bridge current provisions. • Medium - long term: future guidance / policy uses consistent terminology. 	R1(b), R6(a), R7 & R9
	1.3 Appropriate engagement methods	Varying engagement approaches to fit the context, type of project, audience and planning / development stage is essential. Engagement exercises should be accessible.	<ul style="list-style-type: none"> • Support to LPAs to identify / devise fitting engagement exercises. • Best practice from cases in this study should be distributed. • Medium term: issue guidance on the pros and cons of various tools. • Medium - long term: provide training / support to front line officers. • Medium - long term: provide engagement guidance to elected members involved in decision making. • Medium term: Foster public awareness initiatives using innovative media to reach various types of citizens and groups. 	R1, R2, R3, R4, R5, R6(b), R7, R8.
	1.4 Advertise, promote, encourage	Using lay language and methods nearer to people’s lives could improve the reach of advertisement. Innovative use of visuals could better promote events. Encouragement will come over time through trust.	<ul style="list-style-type: none"> • Effective advertisement using simultaneously and in a synergic fashion a range of channels (online and offline) • Support to LPAs to develop effective communication strategies for that ensure consistency and transparency over time. • Enrich planning communications via graphic / video etc., whether online and face to face. 	R1(c), R2, R3, R7, R10, R15.
	1.5 Share best practice and guidance	The value of good engagement practice should be celebrated and shared systematically	<ul style="list-style-type: none"> • Guidance on appropriate training for elected members at all levels. • Guidance for developers as to what kinds of engagement is appropriate at different stages. • Share training opportunities with a variety of stakeholders. • Training the public on planning issues. Share case studies. • Raise profile by issuing annual calls for sharing case studies. • Support annual awards for best practice in community engagement. 	R4, R6(b),

	Issues	Key Findings	Potential Actions	R. No.
Theme 2: Engagement as continuous process	2.1 Early start	The earlier meaningful engagement takes place in the planning process, and the more it connects to Place planning, the better the likely outcomes for all stakeholders.	<ul style="list-style-type: none"> • Encourage engagement in larger developments to coincide with plan making stages. • Link engagement across time with Place planning / digital means • This might have to be further clarified in policy and further training may be necessary. 	R14 & R17
	2.2 A joined-up continuous process	Engagement is more meaningful when seen as a continuous exercise subsuming a series of linked stepping-stones (rather than separate one-time consultation exercises).	<ul style="list-style-type: none"> • Dedicated officers would allow engagement knowledge and communication to be consistent through all stages. • Developing and adopting easily accessible on-line repositories consistently archiving outcomes of engagement exercises over time. 	R14 & R16
	2.3 Ongoing conversations not consensus	The aim of engagement activities should not be to reach consensus on every issue, but to expose people to the views of others and create common understanding.	<ul style="list-style-type: none"> • Engagement needs to be carefully designed to allow 2-way conversations amongst a variety of groups. • The role played by elected members (at community and authority level) and appropriate scene-setting and reporting would be crucial for progressive conversations with technical and political relevance. 	R6(b), R12, R13
	2.4 Enabling communities	Place Plans could be key to linking planning with the making of better places for people.	<ul style="list-style-type: none"> • Facilitate better understanding of what Place plans are achieving and their links with planning to develop practice in Wales. • Funding / resources for Community groups and councils, particularly in smaller communities. 	R6(c), R7, R15
	2.5 Connect specialist and local knowledge	Reciprocal exchange of knowledge through engagement benefits all stakeholders and adds value	<ul style="list-style-type: none"> • Field data stressed role of local communities and communities of interest in providing knowledge that would not otherwise be accessed. Consistent inclusion of communities of interest and local communities in engagement via effective 2-way communication. 	R1(b), R3, R4, R15

	Issues	Key Findings	Potential Actions	R. No.
Theme 3: Engagement as a technical and a political activity	3.1 Enabling elected members	Elected members need to play a more active role in engagement in planning matters.	<ul style="list-style-type: none"> • A systematic, coordinated national programme of planning (and engagement) training for elected members at all levels. • Specific guidelines on nature of role of elected members, at each stage of statutory engagement. 	R1(b), R3,
	3.2 Taking stock and developing Place Plan practice	Place Plans may bridge between Place making and overarching plans and policies at national, strategic and local levels.	<ul style="list-style-type: none"> • Comprehensively review recent practices around Place Plans – particularly in respect to their spatial content and their role in simplifying community access to statutory planning setting. 	R6(c)
	3.3 Avoid ticking boxes	Opportunity to add explanatory notes, checklists and guidance as to what makes engagement meaningful via presentation of the added value it provides to the process.	<ul style="list-style-type: none"> • Medium term: Enrich current statutory requirements with examples, checklists and guidelines as to what makes engagement activities meaningful and worth pursuing as they provide added value. • Opportunities to celebrate and raise awareness of good practice should be explored. • Consider legislative / policy change in future, subject to findings of further research. 	R1(b), R3, R4, R5, R6(a)
	3.4 Overcome negative bias	Negative bias, hindering meaningful engagement, emerge from perceptions held from all stakeholders on each other.	<ul style="list-style-type: none"> • Training for officers. • Strong local voices to become champions and engage as catalysts beyond their own communities. 	R1, R3, R4, R10, R14.

	Issues	Key Findings	Potential Actions	R. No.
Theme 4 – Transparency in decision-making and accountability of outcomes	4.1 Reporting as a duty	There are opportunities to improve feedback and reporting to engagement participants	<ul style="list-style-type: none"> Ensuring inclusion of descriptions of how feedback will be provided to be added to all engagement / consultation communications and a subscriber-type electronic notification procedure incorporated into online consultation submission systems. Further research to understand how to better report after each engagement episode to build (added) value over time. 	R2, R6(a),
	4.2 Building trust with honesty and transparency	Trust is fostered and tended to by enabling participants to orientate through a transparent joined-up route through engagement (i.e. 'Place-planning').	<ul style="list-style-type: none"> Raising understanding of the scope of the process, Better communication Expectations management actively practiced from the outset, Enabling participants to orientate in a joined-up route through engagement linked to Place plans. 	R1(b), R3, R4, R6(b), R7
	4.3 Train LPA officers to meaningfully engage	LPA Officers unclear of their role in an engagement process and unsure about methods beyond the few routinely used. Even where there is a will to engage resource and time pressures limit space for innovation.	<ul style="list-style-type: none"> A systematic approach to assessing engagement skills and dedicated resources available in LPAs. Providing tailored training. 	R3, R4, R8, R15
	4.4 Co-produce and agree processes	Co-production of engagement activities can improve numbers and diversity of participants.	<ul style="list-style-type: none"> Co-production and advanced agreement as to the nature and type of engagement to improve participation numbers and diversify the audience. 	R1(b), R9, R10, R12, R13

	Issues	Key Findings	Potential Actions	R. No.
Theme 5 – Certainty of process	5.1 Smoother process	Certainty of engagement processes support efficient and smooth decision-making, adding value and avoiding risks related to ex-post legal challenges.	<ul style="list-style-type: none"> Developer-led engagement should commence much earlier as part of the LDP preparation process and proceed to PAC and applications in a concerted and consistent way. Ideally, Place Plans could be timed to accompany and support such a process. 	R1(b), R17
	5.2 Manage expectations	It is critical that all stakeholders understand what is and is not possible in terms of the outcomes of each stage of engagement and that concrete measures are taken to support expectations management by LPAs	<ul style="list-style-type: none"> Comprehensive guidance on expectations management through communication developed and circulated in the medium term. 	R1(b), R3, R4, R9, R10,
	5.3 Create shared understandings	Building local knowledge and shared understanding are excellent examples of added value produced by meaningful engagement practice.	<ul style="list-style-type: none"> Care should be given to establishing 2-way channels of communication whereby local insights interact with technical and specialist knowledge as much as technical expertise is shared and openly discussed 	R2, R3, R4, R7
	5.4 Time appropriately	Time (and specifically alignments across Place planning) is of the essence for meaningful engagement	<ul style="list-style-type: none"> Recognise that time and timeframes are of the essence when aiming to achieve meaningful engagement; Acknowledge and provide flexibility of approach for engagement that is ‘fitting’ its context and goals. 	R3, R4, R7, R12, R13

	Issues	Key Findings	Potential Actions	R. No.
Theme 6 – Costs and equity	6.1 Engage inclusively	It is critical that all engagement reaches out and is designed with 'hard to reach' groups in mind	<ul style="list-style-type: none"> • Further guidance, training and support as to how to link up and keep good links with existing groups locally and specialist charities should be consistent across Wales. • Encouraging 'local champions' to promote engagement opportunities more widely. 	R1, R3, R4, R15
	6.2 Engage creatively	Creative approaches to engagement, using specialist expertise where appropriate, can produce more meaningful engagement in a resource-efficient manner	<ul style="list-style-type: none"> • A review of methods and cross-sector accepted guidance adapted to the context of Wales could provide a consistent basis for LPAs to be daring and more creative as well as highlight clearly when specialist external expertise needs to be harnessed. 	R6(a), R12, R13
	6.3 Tread carefully on-line	Use of online engagement tools is a cost-effective way to broaden reach, and its potential and limitations for the Welsh context should be recognised	<ul style="list-style-type: none"> • Further research on how online tools could serve the variety of contexts and territories of Wales in order to devise ways forward. 	R6(a), R11, R14
	6.4 Build on existing networks	Using existing community networks can be resource and cost-efficient, subject to appropriate communication	<ul style="list-style-type: none"> • More research should be conducted by LPAs to build a map of relevant local networks for engagement. 	R13, R15

Recommendations

At the request of Welsh Government, the following recommendations have been devised and categorised by their potential deliverability:

- i). Shorter term 'quick wins', that can be delivered by addressing issues of detail, procedural clarification and production of guidance etc. (e.g. could be delivered within 1 year).
- ii). Medium-term priorities that may take time to initiate and deliver but do not necessarily require intensive work (could be delivered in 1-3 years).
- iii). Longer-term priorities that address points of principle, may require policy/legislative changes or deep-rooted cultural matters (could be delivered in 3-5 years+).

The table above shows how these recommendations have emerged. All of these recommendations could be delivered with the support of Planning Aid Wales unless indicated otherwise.

1. Quick Wins

In the short term, Planning Aid Wales recommends that:

- R1. Welsh Government initiates a programme of work that focused on documenting and improving engagement practice in planning through guidance and best practice, prioritising:
 - a) Circulation of a summary of the findings of this report to all stakeholders in the planning system in Wales.
 - b) Preparation of guidance on engagement definitions, approaches and techniques and how they might be applied at all levels of the planning system and in particular, how the Well-being of Future Generations Act can be used to frame better practice in this context. This guidance should encourage the development of approaches in collaboration with community stakeholders.
 - c) Supporting delivery of an ongoing mechanism for gathering and circulating case studies and best practice engagement in planning in Wales.
- R2. Welsh Government encourages Local Planning Authorities and Developers to modify statutory consultation / notification letters to clearly explain opportunities to engage, support development and how and where feedback on responses received can be obtained.
- R3. Welsh Government issues guidance and / or facilitates the delivery of training on effective communication with communities and hard-to-reach groups in the planning process.
- R4. Welsh Government commissions national programmes of training for Local Planning Authorities on innovative engagement practice.
- R5. Welsh Government, Local Planning Authorities and other organisations support the establishment of cross-sector awards on community engagement in planning.

2. Medium term recommendations

In the medium term, Planning Aid Wales recommends that:

- R6. Welsh Government commissions further research on:
 - a) Defining and measuring engagement outcomes in the planning system.
 - b) Improving the role of elected members in the planning process.
 - c) Overcoming barriers to Place Plan preparation.
- R7. Welsh Government facilitates the delivery more initiatives to raise public awareness and understanding of the planning process, including video guidance and other innovative digital media.
- R8. Welsh Government introduces initiatives to better support and facilitate the engagement of young people in the planning process.
- R9. Welsh Government ensures that future updates of the Development Plans and Development Management manuals include dedicated sections on delivering engagement through these processes.
- R10. Welsh Government ensures that when future planning policy guidance is issued/reviewed, they include dedicated sections on engagement relevant to the topic, using consistent and well-defined terminology.
- R11. Welsh Government pilots the use of visual engagement techniques in statutory notifications.
- R12. Welsh Government works collaboratively with stakeholders and a wide range of community representatives to develop a set of national principles on engagement in planning.
- R13. Local Planning Authorities each work with their own community stakeholders to develop a set of engagement principles that apply both to planning policy preparation and development management.

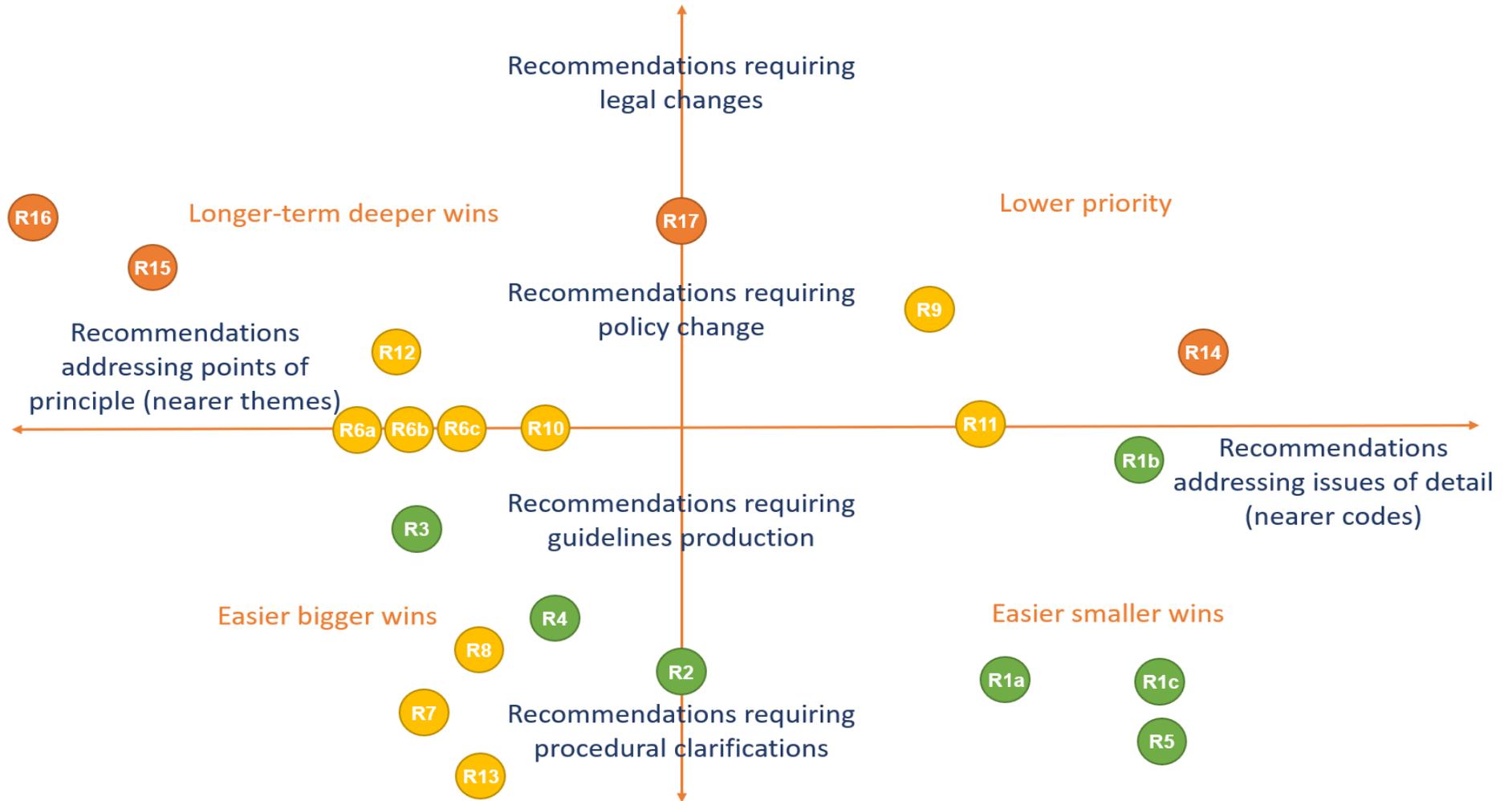
3. Longer term recommendations

In the longer term, Planning Aid Wales recommends that:

- R14. Welsh Government supports the development of a national electronic system to track and permanently record engagement activity across Wales.
- R15. Welsh Government delivers opportunities to resource engagement in planning through direct funding, establishing regional support networks and providing sources of information, guidance, and training.
- R16. Local Planning Authorities consider appointing dedicated engagement officers within planning teams, through advice, training and if appropriate, funding.
- R17. Welsh Government reviews the Pre-Application Consultation process to facilitate earlier engagement in the development cycle and meaningful assessment of PAC reports.

The image below provides a graphic representation of which recommendations might have more resonance as well as a view of which of these lend themselves to quicker implementation.

Figure 16: Pritotising recommendations



Appendix A: List organisations who participated in the research

Planning Aid Wales wishes to record its thanks to all individuals, organisations and companies who participated in this research and many others who also gratefully gave their time and shared their insights with us whilst choosing not to be named:

Aberystwyth Town Council

Benham Architects Ltd.

Brecon Beacons National Park Authority

Cardiff County Council

Cardiff University

Ceredigion County Council

Design Commission for Wales

Grasshopper Communications Ltd.

Home Builder's Federation

Huw Griffiths Architects Ltd.

Isle of Anglesey County Council

Land Use Consultants Ltd.

Pembrokeshire County Council

Pembrokeshire National Park Authority

Place Studio Ltd.

Planning Officer's Society for Wales

Powys County Council

Rhos on Sea Town Council

Royal Society for Architects Wales

RTPI Cymru

Shirenewton Community Council

Studio Design Ltd.

Welsh Local Government Association

Wentlooge Community Council

Youth Parliament

Appendix B: Supplementary Table

Layering of core and primary subordinate planning legislation in Wales over time (from Law Wales, no date)

Core Primary Legislation	Principal Subordinate Legislation
	The Town and Country Planning (Use Classes) Order 1987 (SI 1987/764) – prescribes a number of classes of high level use of land.
Town and Country Planning Act 1990 (TCPA 1990) – the third act consolidating planning legislation, it makes provision for LPAs; development management (including appeals and ‘call-in’ of applications); enforcement; special controls; land acquisition for planning purposes; highways.	
Planning (Listed Buildings and Conservation Areas) Act 1990 – links closely to TCPA 1990 and consolidates provisions related to listed buildings (Part 1) and conservation (Part 2).	
Planning (Hazardous Substances) Act 1990	
	The Town and Country Planning (General Permitted Development) Order 1995 (SI 1995/418) – grants permission for development of specified descriptions.
Planning and Compulsory Purchase Act 2004 – not fully in force in Wales but ‘Part 6 provides for the Welsh Spatial Plan and local development plans and is the basis for what is described as the plan-led system in Wales’	

<p>Planning Act 2008 – relates to consent for nationally significant infrastructure projects and makes provision for the community infrastructure levy.</p>	
	<p>The Town and Country Planning (Development Management Procedure) (Wales) Order 2012 (SI 2012/801) – sets out procedures and technical detail in respect to making and determining planning applications; consultation; appeals; local development orders; certificates of lawful use or development; maintenance of registers of planning applications.</p>
<p>Planning (Wales) Act 2015 – strengthens the ‘plan-led’ approach to planning in Wales. Part 3 amends PCPA 2004 to require Welsh Ministers to prepare a NDF to replace the Welsh Spatial Plan; it makes provisions for strategic planning areas (Strategic planning panels to prepare SDPs). Part 4 amends TCPA 1990 to introduce pre-app consultation for certain applications and require LPAs to provide pre-app services. Part 5 amends TCPA 1990 introduces changes related to Developments of National Significance (DNS). Part 6 amends TCPA 1990 to provide LPAs with the power to require retrospective planning applications.</p> <p>Part 8 amends the Commons Act 2006 to introduce provisions related to Town and Village Greens.</p>	
	<p>The Developments of National Significance (Specified Criteria and Prescribed Secondary Consent) (Wales) Regulations 2016 (SI 2016/53) (W.23) – sets out the criteria for DNS.</p>

	The Development of National Significance (Application of Enactments) (Wales) Order 2016 (SI 2016/54) (W.24) – prescribes the relevant sections of TCPA 1990 which pally to the DNS process.
	The Development of National significance (Procedure) (Wales) Order 2016 (SI 2016/55) (W.25) – specifies procedures for DNS permission
	The Development of National Significance (Wales) Regulations 2016 (SI 2016/56) (W.26) – makes provision for pre-app services by LPAs and Welsh Ministers as well as for procedures for DNS examination.
	The Developments of National Significance (Fees) (Wales) Regulations 2016 (SI 2016/57) (W.27) – makes provisions in respect to fees for pre-app services

Appendix C: Survey Questionnaire

THE VALUE OF COMMUNITY ENGAGEMENT IN PLANNING

Your experience

Please provide a brief description in the box below of a community engagement process that you have experienced recently. Whether on a plan or on a project, small or large, (as you see it) – generally successful or not.

Please tell us where exactly it was, what it was about and what your role was.

What **benefits** or **positives** do you believe came out of this process, and **for whom**?

What perhaps, was **less successful**, what **negatives** were there and again, **for whom**?

What do you think the key things are that would have **made this process better**?

Do you think this would be a good example to look at in more detail for this project?

YES NO

Would you be happy to be the initial contact for a case study if it were chosen?

YES NO

If no, please suggest as an appropriate contact?

Name:

Contact details (email and/or phone):

Advantages

The following are some statements often made about the **benefits** of community engagement in planning **generally**.

- For each benefit listed, place an 'X' the relevant box on the given scale, from 1 (strongly disagree) to 5 (strongly agree)
- Add any other benefits you consider are important.

Good community engagement can:

	Strongly Disagree		Neutral		Strongly Agree
	1	2	3	4	5
Introduce community ideas, concerns, and aspirations.					
Introduce community knowledge and information.					
Raise community awareness and understanding of planning.					
Help to secure community agreement on a plan or project.					
Save time <i>overall</i> from 'day 1' to completed plan or project.					
Save resources <i>overall</i> from 'day1' for all parties.					
Improve the quality/deliverability of the end plan or project.					

Any other suggested benefits or comments?

Disadvantages

The following are some statements often made about the **disbenefits** or **disadvantages** of community engagement in planning **generally**.

- For each disbenefit listed, place an 'X' in the relevant box on the given scale, from 1 (strongly disagree) to 5 (strongly agree)
- Add any other disbenefits / disadvantages you consider are important

Community engagement can be negative because:

	Strongly Disagree		Neutral	Strongly Agree	
	1	2	3	4	5
Few people understand enough to contribute usefully.					
Community views should not outweigh broader aspirations.					
Comments often have little to do with planning issues.					
Community views are always parochial, or even selfish.					
Securing agreement from a range of people is impossible.					
People are tired of responding to consultations that do not lead to change or provide feedback.					
People do not bother responding.					

Any other suggested disbenefits or comments?

Improving Practice

The following are often argued to be key general principles for making engagement genuine and effective.

- For each principle listed, place an 'X' in the relevant box on the given scale, from 1 (strongly disagree) to 5 (strongly agree)
- Add any other principles you consider are important.

	Strongly Disagree		Neutral		Strongly Agree
	1	2	3	4	5
Start early, on 'day 1'; not when a plan is drafted, or a project is designed.					
Make clear what can and cannot be changed as a result of engagement.					
Share information that is understandable to non-experts.					
Making sure to contact and engage all key groups and individuals.					
Ensuring the 'usual suspects' do not dominate the process.					
Use a range of methods and times that enable everybody to contribute.					
Offer more than just one or two opportunities to contribute.					
Offer genuine options (or explain why no others are possible).					
Produce and share a final report to show contributions were used.					

Any other suggested improvements or comments?

THANK YOU VERY MUCH!

Please return the completed questionnaire to: deb@planningaidwales.org.uk

This email address can also be used if you have any comments or questions.

By returning this form, you provide consent for your data to be processed in line with the privacy notice ([click here to view](#))

Your info

PRIVACY NOTE: The following personal data will be used to contact you regarding further participation in this study only and will be stored separately from your response to the rest of the survey. Your responses to previous questions will be stored anonymously and in a non-directly attributable way. We will keep this data safely in password-protected files for three years, and the findings in a raw format form will only be seen by the Planning Aid Wales Ltd. research team. Completion of the following form is OPTIONAL.

Name:

Location:

Organisation:

Role:

Email:

Appendix D: Stakeholder Focus Group

Briefing Paper

BRIEFING PAPER – THE VALUE OF ENGAGEMENT FOCUS GROUP

Date: 12th November 2020

Time: 11.00 - 13.00

The discussion session (you will be joining) is focused primarily on suggesting:

How the Welsh Government, along with others agencies and bodies such as yours, could move forward to ensure that effective and meaningful community engagement becomes a regular part of practice in the planning process in Wales.

To maximise the outcomes of the discussion, Thursday's Focus Group will be led by Jeff Bishop of Place Studio in Bristol. Jeff has been supporting the work on our project because of the remarkably long and wide experience he brings on all aspects of engagement, with all sorts of groups and on all types of project, not just in the UK. A short summary of his experience is appended.

Introduction from Jeff

Following some introductions and brief scene-setting, I am suggesting an agenda of three stages to the discussion, with the major time emphasis on the very practical third stage. The event will be recorded, a written note will be produced by PAW and shared with all participants and amended if necessary to produce an agreed version.

Just to be clear, we will be discussing engagement in all aspects - Local Plans, Place Plans, Supplementary Planning Guidance and work towards planning applications.

Stage 1: Should we be doing this?

The responses to the recent survey from all groups and sectors showed clear agreement that more and better engagement is both appropriate and necessary. This is similar to the results from many other exercises. But that is not a carte blanche just to move on because the general experience is that poorly designed and managed engagement is not worth doing, even potentially damaging, whereas well designed and well managed engagement can deliver genuine benefits for all.

Though it would be good not to linger on this, it seems important to at least take a brief check that people agree that good community engagement is important.

Stage 2: What might be 'good engagement'?

For over 50 years, academics, practitioners and policy makers have struggled to find any agreed definition of engagement in planning or set standards by which to judge it! That is not entirely the case today because some principles definitely appear to be emerging as commonly agreed amongst all key parties. As an example, a version of the list below was shared with people across Wales in the recent survey and, in general, these principles secured support from all.

This is not the session in which to discuss the principles in any real detail but it would be valuable to at least see and get brief comments on those listed below:

- **Clear Overall Process:** a planned process, not just one event/activity and not just a random set of events/activities.
- **'Independent' Design and Management:** making sure that everything is clearly being taken forward on behalf of all involved not just whoever set up the engagement.
- **Agreed Process:** agreeing the process at the very outset with key parties (also a classic way to show appropriate independence).
- **Clear Scope:** making it very clear to all what is, what might be and what is not open to change as a result of their involvement.
- **Start on 'Day One':** avoiding presenting then defending ideas, plans, designs already done; engage people at the very start.
- **Openness, Honesty, Trust:** these are things that have to be worked on and built up as engagement proceeds.
- **Inclusiveness:** wide agreement and appropriate methods are needed to identify all who should be engaged and how to do so.
- **Mutual Education and Exchange:** ensuring that all involved understand the process they are part of and hence the ideas and information they can contribute.
- **Common Information Base:** building and sharing information about all those aspects where there is agreement and focus on those where there is not.
- **Methods not Method:** no single method can ever reach everybody; different ones are needed at different stages with different people and groups.
- **Clear Feedback:** providing regular feedback to all, including (and explaining) about those ideas that could not be taken on board.
- **Final Reporting:** producing and sharing a thorough final report with enough detail to enable anybody else to assess whether the principles have been met.

Stage 3: Making it happen

This is now the key stage. Your help is needed in discussing the possible ways in which good practice in engagement in planning could be made the norm across Wales in all aspects of planning:

What could – or should – be done? Who by, notably by single groups/sectors or working together? Exactly how? When - all at once or in sequence?

What follows is my own thoughts and ideas, simply to get discussion started. They may be inappropriate or unnecessary in Wales, there may be variations, important extra details of who and how, and even – which would be really good – **your own other, better ideas!**

And what is centrally important to the success of any of the following is that it should form a coherent programme, offering exactly the same key points, principles, guidelines and so forth in all areas of planning and to all parties; something woefully missing in material and activities to date.

Guidance

A few years ago a guide was produced for England called '10 Commitments for Effective Pre-application Engagement'. (Was it ever disseminated in Wales?) What was so important about it was that it was produced in collaboration with the British Property Federation, the Home Builders Federation, the Federation of Master Builders (industry), the Local Government Association, The Royal Town Planning Institute, The Planning Advisory Service, the Planning officers Society (government and professions) and Locality (community). The key point is therefore not that the '10 Commitments' is really good (it is OK, and it only covers projects) but that it was produced collaboratively. I would suggest that an equivalent for Wales, again produced collaboratively, would offer a shared baseline from which other more detailed and sector-specific guides could follow, and to cover plan-making not just pre-app work.

If the above set a common baseline, more specific guidance can be produced for different groups and sectors and on different aspects of planning. Much of what is in these guides would be common but the detail would vary for the group and topic. There are some good guides available at present but they almost all use different principles and are rarely clear about who or what they are directed at. Drawing from these existing guides to produce a consistent suite of documents would not be a greatly onerous task but, again, it is the consistency (along with the shared authorship) that would add the real value.

Training

I think all would agree – start young! And there are some excellent resources available from Education Wales to help primary and high schools to engage their students in planning issues.

The next obvious level is initial professional education for planners, architects and surveyors but, as of now, only a few trainee planners ever get more than a brief, and often solely theoretical, introduction to engagement work. This is a key gap to fill.

Perhaps the key way forward is community education (e.g. for Community Councillors and the general public) and mid career education for professionals, although all this is very fragmentary. PAW and perhaps others have done some of the former in Wales, and others have also run courses for professionals. However, it is unlikely that all this training has used an all-important common base of principles etc. And much has been just for one sector only, when my own experience suggests that training for mixed groups is likely to be particularly effective.

One key group probably requiring training is Planning Inspectors. Without the skills necessary to evaluate any report on engagement on a plan or project (which I am not aware ever happens), they cannot be expected to challenge what has taken place. Enhancing their skills is

crucial if all involved know that it is worth committing the effort involved in engagement because it will be valued at the key stage when a plan is to be finally adopted or a refusal for a project may be challenged.

Case Studies

Whilst some case studies were identified through the recent survey, suggestions for more positive examples are welcome. Producing and sharing positive case study examples is a very effective way of raising people's awareness and aspirations; they often trigger a "why can't we do that?" response. The low number of positive examples is not a reason to not start assembling case studies now. An approach used before on other issues is to start with successful examples from other places and then slowly (or hopefully quickly!) replace them with good examples from, in this case, Wales.

Support Service

Learning something totally new in the comfort of the office can still be challenging. To try out some newly learned skills and methods with others, for example a local community, can be frightening! Bringing in others to lead some engagement work for you does not help to build skills, but distance support and guidance, or quietly managed practical help on the spot, are key ways to pass on and develop skills and confidence. Some type of support and guidance service, certainly for at least the first few years of a new initiative, is probably essential, building on training, guidance and case studies.

Legislation

The original brief for the PAW study made it clear that any conclusions should not be dependent on changes to legislation or new legislation. While this is understood, it has to be said that, although much of the above (guidance etc.) exists in England and has done for some time, the usual response - not just from developers but also planners and others - is that unless they are formally and legally required to do engagement of any sort, and particularly engagement that reaches good standards, it will remain the exception not the norm. And without any legislative backing, there are probably limits to how much planners can press for it, communities demand it or Inspectors enforce it.

A strong, coherent, sustained programme of good quality guidance, training, case studies and support across a whole nation has never been tried – although Wales is probably better set up to do one than England – but without the 'clout' that comes with at least some form of legislative or other high level and formal backing, its influence would probably still be limited.

APPENDIX: BRIEF CV FOR JEFF BISHOP

Until 1987 I was Director of a small consultancy called **BDOR Limited**. Relevant work with BDOR, on community engagement generally as well as pre-application work, included:

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- Leading the 1982-4 Department of the Environment national research project, and producing the subsequent report, on “Community Involvement in Planning and Development”.
- Inventing community-led Village (later Town) Design Statements for the (then) Countryside Commission.
- Producing background information, with colleagues, that informed the 2004 English Planning Act in terms of a number of pro-community involvement initiatives, e.g. Statements of Community Involvement.
- Following up the above with a national training programme on community engagement in planning (informally supported by government).
- Undertaking training on community engagement for elected members, for the Planning Advisory Service and the Improvement and Development Agency.
- Undertaking training for Community Council members in Wales with Planning Aid Wales.
- Major regeneration projects for Glastonbury, Salisbury, Bridgwater, Bath, Rome and Milan.
- Pre-application work for (amongst others) the national Science Museum in Swindon, a mixed development in Liphook (Hampshire) and Tate St. Ives (rescuing a failed process).

Since 1987 I have worked part-time with **Place Studio Limited**. Relevant examples include:

- Undertaking all the highly rated community engagement work on the Thame Neighbourhood Plan - given an RTPI national award and a Commendation from a national community organisation.
- Undertaking the pre-application work on the Baltic Wharf housing project in Totnes - Highly Commended in two national awards schemes.
- Undertaking the pre-application engagement on a housing project in Modbury (Devon) – currently shortlisted for a regional award.
- Engaging many communities in housing site selection as part of two Local Plans - shortlisted for a national award.
- Drafting a ‘Pre-Application Community Involvement Protocol’ for Stroud District Council that is now part of an adopted Local Plan and several Neighbourhood Plans.
- Producing a practical handbook book on community engagement – **The Craft of Collaborative Planning** - commissioned by Routledge in their RTPI series and targeted to international as well as UK markets.

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Terminology vignette sources:

Legislation: Planning Wales Act 2015, Planning and Compensation Act 2014, Town and Country Planning Act 1990.

National Policy: Draft NDF, PPW, TANS.

WG Manuals: Development Management Manual, Development Plans Manual.

LDPS: 4 LDPs across North, South, West and National Park.

LDP Sustainability Appraisals: 3 Appraisals North, South and National Park.

LDP Inspector Reports: 4 LDPs across North, South, West and National Park.

Planning Applications: 6 planning applications across different LPAS.(It should be noted that most references to community related to Community Council response or community facilities).

Planning Appeals: 10 s.78 appeal decisions across Wales.

PINS Guidance: 2 documents; Planning, Listed Building & Conservation Area Appeals & Planning Inspectorate Local Development Plan Examinations Procedure Guidance

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