

**Environment and Housing Scrutiny Panel
Community Engagement with Planning
Evidence Gathering Session 3 – Community Group Representatives
(18th February 2014)**

Present: Cllr McNamara (Chair), Cllr Bull and Cllr Weber

Apologies: Cllr Alexander, Cllr Ejiofor and Cllr Mallett

In attendance:

Alison Blom-Cooper (Haringey Council), Stephen Kelly (Haringey Council), Clodagh McGuirk (Haringey Council), Sule Nisanlocgu (Haringey Council), Mercy Oriwari (Haringey Council) and Emma Williamson (Haringey Council).

David Roach, DP9, Planning Consultancy

Caroline Simpson (Bowes Park Community Association), Ronald Lock (Bounds Green residents Association), Ken Ranson (Bounds Green Residents Association), Mick Gerrie (Bounds Green Residents Association), Candy Amsden (Wards Corner Community Coalition/ CARA), Dave Morris (Haringey Federation of Residents Associations/ Our Tottenham Network), Gail Waldman (Highgate Society), Eddie Capstick (Alexandra Ward Mobility Group), Pippa Robinson (BGDRA), Delphine Grauf, Chris Faulkener (Freeholder Community Association), Marcus Ballard (Parkside Malvern RA), Joan Tracey Benoit, Hesketh Benoit, Michael Kyriacou, Chritos Koizi, Evelyn Ryan, Jeff Lever, Stephen Brice (Pinkham Way Alliance), Paul Bumpstead, Michael Hammerson (Highgate Society), Joyce Rosser, Tottenham CAAC).

1. Introduction

1.1 The Chair introduced the meeting, the third evidence gathering session of the Environment & Housing Scrutiny Committee assessing Community Engagement with Planning Services. The aim of this work is to assess how the planning service engages and supports meaningful community involvement in planning developments and decision making. The key areas the panel looking at include:

- Statement of Community Involvement
- Role of members
- Capacity building of community
- Role of IT and new social media
- Implications of recent legislation

1.2. The panel noted work that has been completed to date, including two previous evidence gathering sessions:

- Local Policy and Practice (November 2013)
 - AD Planning,
 - Planning Policy Officers,
 - Development Management Officers
- Comparative Policy and Practice (January 2014)
 - Planning Aid For London

- Planning Advisory Service
- Islington Council

2. Developer perspectives

- 2.1 A representative from Dp9 (planning consultancy) attended to provide the panel with a developers perspective of local planning processes. It was noted that Dp9 works within a number of London authorities, so was in a good position to provide some comparative insight in to local planning processes. Thus the reflections provided were not an assessment of Haringey Council but a generalised view of other local authorities.
- 2.2 It was noted that a key trait that developers were looking for in working with local authorities on local schemes was 'certainty'. This certainty, whether it was favourable or not to the developer position, was exemplified in a number of ways:
- A clear and transparent timetable which detailed key planning milestones (consultations) and when decisions are taken;
 - Greater clarity on the political and strategic priorities of the council for local development;
 - Unitary Development Plan and other local planning policies are compliant.
- 2.3 It was important that key objections and issues with any proposed scheme are raised as early as possible to allow for planned and timely solutions to be put in place. It was noted that delays can occur when:
- Local planning policies are not compliant (out of date, in need of updating);
 - There is poor member engagement; which can lead to
 - Issues or objections raised for the first time at Committee.
- 2.4 The panel heard that developers receive feedback on planned developments from numerous council services (waste, transport, planning), though this is not always coordinated, consistent or timely (e.g. responses were provided at different times, different recommendations etc). The panel noted that it was of critical importance that there is coordinated multidisciplinary feedback on proposed development which is both timely and coherent.

Planning Performance Agreement

- 2.5 The panel noted that it can be difficult to determine planning applications within the statutory timeframe, particulate when large developments may raise many complex issues (e.g. high density development, mixed use, historic environment, local community concerns). In such cases, a Planning Performance Agreement between the Local Planning Authority and prospective developer can be reached to allow decisions to be taken outside the statutory timeframe.
- 2.6 The panel noted that Planning Performance Agreements are essentially a project management process and tool to improve the quality of major planning applications and to provide greater certainty and transparency in the development of major schemes, in the assessment of the planning applications and in the decision making process. This process can help to provide:
- Key timescales for the applicant for submissions and decisions

- Information to support engagement and consultation (e.g. details of who is consulted and when).
- 2.7 It was noted that a fee can be payable for such Planning Performance Agreements (£26,000) and can give both the developer and Local Planning Service a clearer route map of the planning agreement process.

Member engagement

- 2.8 Given their local knowledge and understanding of community issues, early member engagement was identified to be important in the smooth progression of development schemes. The panel noted that where there was early member engagement (with both planning members and ward councillors) this allowed earlier discussions on the proposed scheme and the early identification of possible faults or objections (which could be more easily rectified at this stage).

Community engagement

- 2.10 The panel noted that the benefits of planned community engagement and consultation has become more widely recognised and is being adopted more widely in development plans. It was noted that a key factor in successful schemes is the degree of community consultation that has been undertaken as this helps bring a wide ranging benefits, particularly if this early within the scheme development.

3. Community Group Representations

- 3.1 The panel received a number of submissions from representatives of local community groups attending the meeting. Group representatives were asked to describe their experience within local planning consultations and to identify those consultation and involvement processes which were successful and those that needed to be improved. The purpose of this exercise was to develop key priorities to support improved community engagement in local planning processes.

Haringey Federation of Residents Association/ Our Tottenham

- 3.2 Four documents were submitted by Haringey Federation of Residents Association/ Our Tottenham:
1. Presentation to the London Assembly Planning Committee, 10th October 2013
 2. Our Tottenham Community Charter (May 2013)
 3. Our Tottenham Community Planning conference (Feb 2014) summary
 4. Analysis by affected traders, and by Our Tottenham, of the controversial High Road West consultation
- 3.3 The panel noted that there were a number of inherent problem which inhibited community engagement and involvement in planning processes at all levels (local, pan London and nationally).
- That developers generally had more resources, knowledge and expertise at their disposal than local communities which created an unequal playing field in local development consultations;
 - Key planning strategies do not embody the principle of community consultation and involvement (e.g. London Plan, Lipton Report 'It Took Another Riot');
 - Definition of affordable housing being used to drive development undermines the credibility of the planning system and local people's willingness to engage with it.

- The complexity of planning policies and processes is such that few individuals or groups can meaningfully contribute to development management or planning policy consultations;
- 3.4 The community are also confused by the role of the Council in local planning processes which outwardly appear to straddle the interests of both developers and the community. It was suggested that this, together with the complexity of local planning processes, has created a growing cynicism within the community about where decisions are actually taken for new development and the validity of community involvement. Two examples were provided which it was suggested, have undermined community confidence of engagement local planning processes:
- The refusal of the Council to engage with the Wards Corner Community Coalition or assess its submitted Community Plan;
 - The perceived bias in the consultation over Love Line and High Road West.
- 3.5 It was suggested that the cumulative impact of the above left the community feeling that 'its all too complicated' and 'why bother as the Council never listen anyway.... they usually consult when they've already made up their mind.... .' There was also a suggestion that there was consultation fatigue within the community, with residents being asked for information with few tangible outcomes.
- 3.6 HFRA pointed out to the panel, that the variety of local community groups in Haringey represented a significant resource for the council. Such groups contained much knowledge, skills and expertise across a wide range of issues which the council was not utilising. It was suggested that greater engagement and involvement with these groups, together with greater trust could bring significant benefits to local communities.
- 3.7 HFRA and Our Tottenham made 6 key recommendations to the panel:
1. There is a need to redefine 'affordable housing' so that it is genuinely affordable to those who most need it, and ensure the maximum levels in all development.
 2. No developers to be allowed to be exempt from appropriate s106 / CIL and other community obligations.
 3. Make sure that any public funding for development or regeneration comes with an obligation to demonstrate genuine community support, empowerment and partnerships.
 4. Ensure that every development application has a community partner – no partner, no development.
 5. That the Council sign up to the Out Tottenham Charter.
 6. That the council support the development of Community Plans (Lorship Rec was cited as a positive example).

Highgate Society

- 3.8 The panel noted that the Highgate Society spans four local authorities, is actively engaged in planning issues with these authorities and as a result, its members have considerable experience and knowledge of planning processes. This being said, it is a task for an experienced an organisation as it is, to keep up to date with changes to national, regional and local planning policy framework.

- 3.9 It was emphasised to the panel, that groups such as the Highgate Society could and should be a resource for local planning services given their detailed knowledge of local areas and issues and experience of planning processes. There was a perception however, that community groups were not recognised as such and that a fundamental cultural change needed to be instituted which supported a more active and positive approach to engagement with local community groups.
- 3.10 The group acknowledged the financial pressures that local authorities and local planning services were under which had precipitated the need for local services restructures. However, it was perceived that these had resulted in a number of deficiencies which impacted on local engagement and involvement:
- More active programme for engaging and involving local groups to harness their knowledge and understanding;
 - Inability of planning officers to adopt a holistic approach to planning needs assessments;
 - Lack of cross-boundary planning consultations.
- 3.11 Particular concerns around heritage conservation in the planning process were raised with the panel where it was noted that conservation planning posts had been deleted, there was too much reliance on internal consultation and that there was no 'Heritage Champion' to provide local leadership on these issues (this post was present in other boroughs).
- 3.12 The importance of pre-application consultation was underlined to the panel. It was suggested that early liaison between developers and local communities had numerous benefits for both parties. Communities welcomed early sight of development proposals and the opportunity to feedback and influence plans, though there was inconsistent support and take up among developers (developers did not turn up at an arranged DMF). It was suggested however, that pre-application consultation should be encouraged and supported further.
- 3.13 An important part of the community engagement and consultation cycle is the provision of feedback, where participants are informed of how their contributions have impacted on proposals. It was suggested that this is a significant weakness in the locality in that whilst many people take the time to develop reasoned and meaningful responses to planning proposals, there is generally little record as to how such contributions have shaped and informed final plans. This is problematic for the community in that:
- There is no validation of responses (what information has been useful, what has been disregarded);
 - It does not stimulate or encourage participation in future consultations.
- 3.14 It was suggested that an additional record is created for development or other planning consultations that indicates how feedback data had impacted on the original proposals.
- 3.15 The panel noted community concerns with the planning enforcement function of the council. Local residents and community groups indicated that there were numerous incidents of unauthorised development which was going unchecked or that the council was powerless to stop. Nonetheless, this was also a suggested priority for

the council, for if there was no effective regulation and enforcement of the planning system, this would encourage others to not comply.

- 3.16 The panel noted that where joint training had been provided to officers, members and community representatives, this had been very informative, engaging and positive. The further development of this approach to would be welcomed.

Bounds Green Residents Association

- 3.17 A number of contributors from the residents association gave evidence to the panel. A summary of the main issues presented by contributors is given below.

- 3.18 There was a general perception that the timescales for consultations for new development was insufficient to allow members of the public, residents and local community groups to read, absorb and to construct meaningful responses. It was suggested that there were a number of factors which were not given enough prominence in developing local consultation frameworks. These included:

- The ability of local communities to access information digitally or via the internet;
- The proportion of non- English speaking communities resident in Haringey;
- Unreliability of existing notification schemes (letters to households, posters in lampposts);
- Lack of baseline planning knowledge and understanding within the community (which may necessitate potential respondents to undertake research or seek other sources of advice or support).

- 3.19 It was communicated to the panel that there needed to be greater transparency in consultations for planning development. It was suggested that there was often a welter of supporting information within planning consultations which local residents found difficult to navigate and draw out key facts. In addition, many residents remained confused as to the role of the Council, local planning service and other council departments within such consultations and that greater clarity, particularly around the aims of consultations, would be welcomed.

- 3.20 Whilst much of the discussion had been focused on the efficacy of large scale developments, it was suggested that smaller developments are equally to consider in this debate, as they are more numerous and equally, have a significant impact on those residents affected. The panel noted however, that individual residents in neighbouring properties affected by proposed development often do not know where to start in participating in a consultation or indeed in developing a response. Whilst it was noted that there was information available, individual residents may not have the not knowledge or confidence to draft a response. It was suggested that there should be:

- More information on the council website (particularly in the form of how to guides);
- More guidance from planning officers as to what information is expected, or what issues are valid and considered within applications;
- Signposting to planning advisory services.

- 3.21 As with other contributors to the meeting, there were concerns about the effectiveness of the planning enforcement function in Haringey. It was suggested the use of retrospective planning applications or certificates of lawfulness were being

used to bypass local consultation, which left local residents feeling frustrated and disengaged.

- 3.22 As a general view, it was noted that there was a general absence of younger people involved in local planning consultations and that further work should be undertaken to engage and involve this group locally.

Parkside Malvern Residents Association

- 3.23 A representative from the organisation made a number of points to the panel in relation to community engagement and involvement which are summarised below.

- 3.24 A significant problem for local residents and community groups for involvement in local consultations was the accessibility of planning documentation. The panel noted that even informed local residents struggled with the volume and complexity of planning information. In addition, potential contributors to planning consultations found it difficult to keep pace with planning reforms and how they impacted on planned local development and planning policies.

- 3.24 It was suggested that at present, the planning service and function was too far removed from the communities in which development was taking place. Much of the local frustration in local development was the failure to take on board knowledge and understanding of local issues in developing local plans. In this context, there was a need to involve local residents more, assesses community opinion and ensure that this was factored in to final planning applications or planning policies.

- 3.25 It was suggested that a new strategic approach was needed to planning engagement and involvement in which there was:

- Clearer strategic vision for what the Council is trying to achieve;
- More detailed assessment of community resources and how these can contribute to these objectives;
- More cooperation between interested parties (council, local communities, developers).

- 3.26 It was suggested to the panel that it was the Councils role to ensure that interested parties and stakeholders worked together for best effect in local planning processes. At present, the perception was that there was too much 'head-to-head' in planning processes which has lead to a significant level wasted resources and under achievement. It was suggested that the Council, in its overarching role, should provide greater leadership and vision in taking this forward (the use of local Champions was suggested).

West Green Residents Association

- 3.27 It was suggested to the panel that the reliance on digital media within planning consultations was the wrong approach to encourage greater involvement of the community. The 'digital by default' approach would omit those 20% of residents who were not connected to the internet or other digital media. Furthermore, the use of letters to publicise planning consultations was felt to be ineffective as many of these do not reach the intended recipient, or not clearly explained.

3.28 Given the complexity of planning issues, it was suggested that greater use should be made of softer consultation engagement methods, such as face to face meeting with planning officers and community consultation events. This approach would also help local planning officers to build knowledge and understanding of local issues. This view was echoed by a number of other groups in attendance.

Freeholders Association

3.29 The panel noted that there was considerable reliance on the planning service website to communicate planning information to local residents and community groups, yet there were evident concerns around the accessibility and navigability of the website. It was noted that there were particular concerns around:

- The labelling of individual responses submitted to planning consultations;
- The effectiveness of the planning search tool.

Myddleton Road Strategy Group

3.30 Planning enforcement was also of concern among members of this group. The panel noted that there were too many retrospective planning applications which bypassed local community involvement and input and was a source of much local anger and feeling of resignation. It was suggested that this was an indicator of the need for greater investment in the mobility of planning officers and to ensure that they have greater connectivity with local issues and development.

Pinkham Way Alliance

3.31 The panel were briefed on the context of this planning application in respect of the proposed development of the Pinkham Way site as part of the North London Waste Plan. This was a complex planning process involving the North London Waste Authority (of which there are 7 borough members, including Haringey) and the implementation of the North London Waste Plan which earmarked the Pinkham Way site in Haringey for multiple waste processing use.

3.32 Within this planning process, representatives highlighted a number of suggested improvements to the way that such large developments are implemented across the borough. This included:

- The need to provide clear, open and transparent information about the development proposal as early in the planning processes as possible, too often there was insufficient information to provide meaningful contributions;
- The role of interested parties should be made clearer in planning processes;
- Where responses have been provided, reasons should be given as to why these were not accepted or taken in to account within development proposals, so that contributors can develop and refine the validity of future submissions.

3.33 The panel noted that the groups reflections of the Statement of Community Involvement was that whilst in principle this was very good, it remained very much a local aspiration rather than a implementable approach.

Wards Corner Coalition

3.34 The panel noted that the Wards Corner Coalition had submitted a Community Plan¹ to the local planning service in October 2013. To date, there has been no communication as to when this would be considered by the local planning committee. This had created much scepticism and mistrust within the group, and considerable frustration given the time and resources local people had contributed to its development. It was suggested that further work may be needed to engage and support local communities in this area, as this was one of the first community plans to be submitted in the locality.

3.35 Concerns about the Strategic Areas for Development plan were also voiced to the panel. It was suggested to the panel that such an important spatial development document (which highlighted areas for development across the borough) would require a different consultative approach to that outlined so far, to really engage and involve local people.

BGDRA (Bounds Green District Residents Association)

3.36 It was suggested that a number of guiding principles should inform all planning processes, these should be:

- What is good for the local community should be of paramount importance and inform local development and planning policies;
- Local officers should have a real knowledge and understanding of the local area and local community groups;
- As there are no second chances for new development, it was suggested that there should be some form of due diligence for planning offices to ensure full procedural compliance;
- That there should be systematic follow up for planning enforcement.

3.37 Given the complexity of the local planning processes and the resources available to developers, it was suggested that there should be improved access to independent planning advice and support for local residents and community groups.

Haringey Planning Service

3.38 Officers from the planning service were in attendance at the meeting to hear community groups representations in person. It was noted that the contributions provided by groups at the meeting had raised deep issues for the service which would need further reflection. It was noted that the service was in the middle of implementing a development improvement programme which it was hoped would help improve communication with local residents and communities as well as helping to restore trust, integrity and confidence in the service.

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3.39 It was noted by the panel that the planning service faces many difficult choices as it seeks to deliver community aspirations for the area alongside other regional and national obligations.

3.40 It was noted that a community planning conference was being planned for 5th April 2014 to further canvass opinion of local planning services and to identify priorities for improvement.

¹ Community Led Plans set out the aspirations of the community to be delivered over the next 5 to 10 years. Actions that might be included range from street cleaning and establishing local festivals to developing new services and installing local energy projects.

EHSP

3.41 Cllr Weber suggested that two initial recommendations for this work:

- The need to involve and support the role of members in planning consultations. Members are an important conduit between local communities and the council and to whom many may first approach for planning advice. It was suggested that further work is undertaken to develop and improve the capacity of members to support local residents.
- Improved access to planning officers would be of benefit to local residents. It was suggested that the establishment of planning officer surgeries could help to improve accesses and involvement in local planning processes.