

APPENDIX B - Community Engagement with Planning Scrutiny Report

Report for:	Overview & Scrutiny Committee April 10 th 2014	Item Number:	
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Title:	Community Engagement with Planning – Final Report
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Report Authorised by:	Cllr Stuart McNamara, Chair of Environment and Housing Scrutiny Panel
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Lead Officer:	Martin Bradford, Scrutiny Officer, Corporate Governance, martin.bradford@haringey.gov.uk
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Ward(s) affected: All	Report for Key/Non Key Decisions:
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1. Describe the issue under consideration

- 1.1 As part of its work programme for 2013/14, the Environment and Housing Scrutiny Panel agreed to assess how the planning service engages and involves the community in local planning processes. The attached report details the conclusions and recommendations developed within this work, for which approval of the Committee is sought.

2. Cabinet Member Introduction

- 2.1 This is not applicable at this stage. The relevant Cabinet Member will introduce a response to the conclusions and recommendations reached in this report when presented at Cabinet.

3. Recommendations

- 3.1 That the Overview & Scrutiny Committee a) note contents of the report and b) agree the recommendations contained within it.

4. Other options considered

- 4.1 This conclusions and recommendations developed within this report have been reached after consideration of the evidence obtained from local stakeholders, national organisations and other local authorities.

5. Background information

- 5.1 Under the agreed terms of reference, Environment and Housing Scrutiny Panel can assist the Council and the Cabinet in its budgetary and policy framework through conducting in depth analysis of local policy issues.
- 5.2 In this context, the Environment and Housing Scrutiny Panel may with the approval of the overarching Overview & Scrutiny Committee:

- Review the performance of the Council in relation to its policy objectives, performance targets and/or particular service areas;
- Conduct research, community and other consultation in the analysis of policy issues and possible options;
- Make recommendations to the Cabinet or relevant nonexecutive Committee arising from the outcome of the scrutiny process.

5.3 An assessment of community engagement practices used within the planning service was agreed to be included within the Environment and Housing Scrutiny Panel work programme by the Overview & Scrutiny Committee at its meeting on June 17th 2013 and the scope of this work agreed by the Environment and Housing Scrutiny Panel on the 19th November 2014.

6. Community engagement with planning service

6.1 As part of its work programme for 2013/14, the Environment and Housing Scrutiny Panel agreed to undertake an assessment of how the local planning service engages and involves local communities.

6.2 The overarching aim of this work was to:

‘To assess whether residents and communities have appropriate opportunities to engage meaningfully in local planning processes through community engagement and involvement strategies within the planning service (with particular reference to the Statement of Community Involvement).’

6.3 In undertaking this work, the Panel has consulted widely with the following stakeholders and agencies:

- Local community groups (via an on line survey and a dedicated meeting);
- Local planning officers (Assistant Director, policy and development management);
- Developers (through a planning consultancy)
- Other local authorities (Islington, Hackney)
- Specialist contributors (Planning Advisory Service, Planning Aid for London).

6.4 The Panel has made 23 recommendations for approval by Overview & Scrutiny Committee to support community engagement with planning in the following areas:

- The need to develop the capacity of the community (improve trust, developing skills, improve understanding);
- The need to develop the capacity of planning officers (consultation skills, accessibility, approach);
- The importance of early engagement in planning consultation processes;
- The need to provide feedback to participants in planning consultations;
- The need to evaluate and evolve consultations to community needs;
- The need to further involve members in planning consultations;
- Improving the quality of planning proposals;
- Greater use of new technology.

7. Comments of the Chief Financial Officer and Financial Implications

- 7.1 At this point the recommendations within this report have not been evaluated to determine the cost of implementation.
- 7.2 It is likely that there will be cost implications associated with additional training, extra public meetings and use of technology and at this point no budget has been identified to fund these initiatives. Therefore the exact cost would need to be determined before any recommendations proceed to Cabinet, so that it is clear whether additional funding is required.

8. Comments of the Assistant Director of Corporate Governance and legal implications

- 8.1 The Assistant Director of Corporate Governance has been consulted on the preparation of this report, and makes the following comments.
- 8.2 The promotion of democratic engagement underpins a number of recent legislative developments relating to Planning and is to be encouraged.
- 8.3 Notwithstanding these developments, Planning remains a statutory process with local decision making open to both statutory appeal and judicial challenge.
- 8.4 The recommendations touch on a number of different elements of that process and will inevitably go some way to increasing the accountability and robustness of local decision making.
- 8.5 The report raises a number of issues which will need specific legal advice and guidance as they are being implemented.

9. Equalities and Community Cohesion Comments

- 9.1 Overview and scrutiny has a strong community engagement role and aims to regularly involve local stakeholders, including residents, in its work. It seeks to do this through:
- Helping to articulate the views of members of the local community and their representatives on issues of local concern
 - As a means of bringing local concerns to the attention of decision makers and incorporate them into policies and strategies
 - Identified and engages with hard to reach groups
 - Helping to develop consensus by seeking to reconcile differing views and developing a shared view of the way forward
 - The evidence generated by scrutiny involvement helps to identify the kind of services wanted by local people
 - It promotes openness and transparency; all meetings are held in public and documents are available to local people.
- 9.2 A number of engagement processes will be used to support the work of the Environment & Housing Scrutiny Panel which will seek to include a broad representation from local stakeholders. It is expected that any equalities issues

identified within the consultation processes will be highlighted and addressed in the conclusions and recommendations reached by the panel.

10. Head of Procurement Comments

10.1 Not applicable.

11. Policy Implications

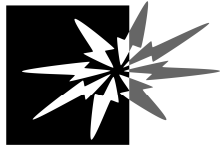
11.1 It is intended that the work of the Environment and Housing Scrutiny Panel will contribute and add value to the work of the Council and its partners in meeting locally agreed priorities. In this context, it is expected that the work of the Panel may contribute to improved policy and practice in the following corporate priorities:

- **Opportunities for all:** drive economic growth in which everyone can participate
- **A better council:** ensure that the Council works in a customer focused way

12. Use of Appendices

12.1 Any appendices are listed at the end of the report

13. Local Government (Access to Information) Act 1985



Haringey Council

Community Engagement by the Planning Service

April 2014

A PROJECT BY THE ENVIRONMENT & HOUSING SCRUTINY PANEL

www.haringey.gov.uk

Foreword

Having a good planning service is integral to shaping local areas and regeneration, something the Council is committed to.

A huge change has been implemented in how the Council operates, including at the planning service, and scrutiny has undertaken work to assist in that process by researching and identifying areas for improvement and ongoing development.

The recommendations bring together a series of themes that are intended to put a greater emphasis on community engagement, including more pre-application consultation and a greater focus and clarity around the role of ward councillors and community groups.



Councillor Stuart McNamara (Chair Environment and Housing Scrutiny Panel)

Environment & Housing Scrutiny Panel members:

Cllr Alexander

Cllr Bloch

Cllr Bull

Cllr Gibson

Cllr Stanton

Cllr Weber

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Recommendations

Capacity Building (Community)

1. That there should be an ongoing programme of information provision for local community groups, residents associations, CAACs and residents to build links, confidence and trust between the planning service and the local community and specifically to:
 - Promote an understanding of the local planning process;
 - Support their engagement and involvement in the development of planning policy; and
 - Support their input into consultations on planned development;
 - Further encourage the cascading of planning information and awareness within the community.

This programme should include:

a) Provision of generic training on planning policy issues (e.g. the Local Development Plan and local planning guidance) and an update on specific planning policy issues (e.g. new legislation, new local planning policies, and current planning policy consultations).

b) Provision of advice and training on the process for considering planning applications (including pre-application engagement, development management fora, the role of the Planning Sub Committee and advice on making representations about planning policy and development proposals)

2. Provision of an information sheet/website detailing all sources of independent planning advice available to local residents, community groups and residents associations and guidance on how to get involved.
3. As part of the corporate customer transformation project, consider the potential for planning officers to provide planning surgeries within the community.

Capacity building (Officers)

4. Officers should take up the support and training offered by the Planning Advisory Service, including ensuring that consultation programmes are coherent and targeted, make use of new methods and are properly evaluated. This should support the development of their skills/ techniques regarding community engagement and a 'train the trainer' session in order to support community engagement.
5. Planning consultations should be seen in the context of wider corporate engagement and should draw upon consultation skills, prior learning and resources available elsewhere in the Council (e.g. parking, regeneration, public health and CYPS). A coordinated approach should be taken with other Council consultations, with a view to a common consultation database being used by all services.

Feedback

6. To improve the feedback given to respondents as part of planning policy consultations as well as respondents to individual planning applications, ensure that the outcomes of the consultation are accurately noted and recorded within final planning decisions / documents.

7. It is recommended that in consultation with the local community and reference groups, the planning service develop brief guidance notes and practical sources of advice to:
 - Assist the community in commenting on planning applications and contributing to planning policy consultations within the context of what counts as material considerations;
 - Guide and signpost householders with submitting properly validated planning applications.
8. It is recommended that an additional condition is placed on decision notices when granting planning permission, especially for larger schemes requiring applicants to place a copy of the notice on the site premises during construction so as to facilitate community inspection and monitoring and where necessary, enforcement.

Early involvement

9. That pre-application engagement is embedded within the planning consultation structures to ensure the earliest engagement possible with ward councillors, local residents associations, CAACs, local businesses, traders associations and members of the public (the reference group).
10. For major proposals, in addition to any consultation undertaken by the applicant, the Council should ensure that the Development Management Forum (DMF) is held at the pre-application stage. This should be linked to greater coordination with the considerations of the Design Panel at the pre-application stage.
11. That there is a pre-committee call over meeting established, open to all members of the Planning Sub Committee, to provide information to members including details of the planning applications to be considered and the planning path taken (e.g. DMF, site visits, consultation).
12. In line with the Localism Act 2011, a revised planning protocol should give greater clarity as to how members can be involved in the pre-application process (including clear and consistent advice on predetermination and predisposition), and in particular how ward councillors for the areas affected by the proposed development can be engaged with. The service may wish to consider the development of a model based on best practice in other local authorities for their Planning Committee to be formally engaged at the pre-application stage (e.g. Hackney, Croydon & Islington).
13. Further consideration should be given to the facilitation of provision for community engagement, including some funding within Planning Performance Agreements for complex planning proposals to allow:
 - The identification of key stakeholders;
 - More time for involvement of local stakeholders (including the reference groups);
 - The development of clear consultation timelines and planning milestones in the planning process.
14. Explore provision within the customer transformation project for residents to provide with email address, so as to facilitate the receipt of notification alerts for planning development/policy in their ward (and or set at a radius of 500m). A local consultation should include as a minimum local councillors, residents, associations,

community groups, businesses and traders associations together with other residents who proactively request inclusion – the reference group.

15. Update the procedure for how members are involved in the planning process for delegated decisions during both the application and consultation stages. This should include the retention of the weekly distribution list of new planning applications, the reporting to Planning Committee of major applications in the pipeline and also recent delegated decisions.

Planning Consultations

16. It is recommend that within planning consultations, processes should:
 - Maximise the use of participative methods;
 - Maximise access to planning officers;
 - Include an evaluation as standard;
 - Involve the reference group (e.g. members, residents associations, community groups, business and traders associations).
17. That the planning service should reconsider how Area Fora are used for planning consultations particularly in relation to:
 - the reach, participation and involvement of the local community;
 - links to development management forum at the pre-application stage;
 - improving the presentation of consultation documents which may support better understanding and engagement at these fora.

Improving quality of planning proposals

18. Greater use of community consultation events to support the formation of pre-planning advice and information for the top 10 planning issues i.e. to create a detailed checklist of information that's needed and how it is presented (N.B what are the top planning issues for the community e.g. design, heritage, conservation, enforcement capacity, durability of materials landscaping etc).

Member development

19. In recognition of the important roles of the ward councillor and the planning champion, engagement, involvement and 'planning champion' have, there should be:
 - A minimum (Level 1) programme of member training and development for all 57 councillors to further enable them to represent community interests within their wards;
 - More Councillors given full (Level 2) training in planning so as to increase the pool of Councillors available to sit on Planning Committee;
 - Further training on planning policy (scope and content of documents as well as timetable for remerging documents);
 - Bespoke web page(s) providing information, advice and support;
 - Clarity over key local contacts in the planning process.
20. That the planning service develop a 'feedback loop' whereby periodically (every 6 months) a review process is undertaken with members to look at development schemes that have been authorised, the purpose being to review development help and ensure that future proposals reflect the views and aspirations of the community and are policy compliant.

Statement of Community Involvement (SCI)

21. It is recommended that in the updating of the SCI the community is consulted so as to reflect the emerging consultation priorities and processes listed elsewhere within this report:
 - 1) Renewed emphasis on the role of members and the reference group;
 - 2) Importance of pre-application discussions and involvement to be given greater status.
22. A dedicated webpage to be provided for the SCI so as to allow for more frequent updates and the provision of useful links for the community.
21. That a short executive summary of the SCI be developed and distributed among the reference group.

New technology

22. Given the importance of digital processes in conveying information and advice in support of planning processes, it is recommended that the planning service reviews the layout, function and utility of the planning section of the so as to:
 - Ensure that GIS technology is fully utilised in planning processes (to enable real location viewing of planning applications (e.g. Wiltshire) and assist in planning notifications;
 - Ensure that the website can be used to capture and report community intelligence that may assist planning enforcement;
 - Ensure that feedback provided within planning and development proposals is clearly labelled;
 - Ensure that existing planning notification, consultation and reporting media (e.g. press, posters, letters) are maintained so as to be best utilised to underpin the increasing shift towards web based services.
23. To improve the accessibility of planning documents it is recommended that the planning service consider the acquisition of 3D modelling software, so as to help the reference group and other interested parties better visualise (and obtain a more accurate representation of) planned major development and planning proposals.

1. Introduction

- 1.1 A review of the Development Management function within Haringey Council was undertaken in May 2012. This review encompassed all service aspects including the planning process, service performance, leadership and customer service. As a result of this evaluation, a Development Management Improvement Programme (DMIP) was established which is being monitored and overseen by Regulatory Committee.
- 1.2 As part of its work programme for 2013/14, the Environment and Housing Scrutiny Panel agreed to undertake an assessment of how the local planning service engages and involves local communities. In particular, the panel agreed to assess Haringey's Statement of Community Involvement (SCI) and to undertake a comparative assessment with other Local Planning Authorities. It is expected that this work will contribute to the DMIP.
- 1.3 In undertaking this work, the Panel consulted widely with local stakeholders, including local community groups, residents' associations and Conservation Area Advisory Committees (CAACs). In addition, evidence has been received from planning services in other London Boroughs as well as specialist planning services such as the Planning Advisory Service and Planning Aid for London. It is hoped therefore, that the conclusions and recommendations developed within this report will guide and inform the approach to community engagement by Haringey Planning Service.

2. Background

- 2.1 It is broadly acknowledged that community involvement is key factor in the delivery of good planning outcomes as this can help to empower individuals and communities to play an active role in shaping the community in which they live. Furthermore, community engagement within planning processes can:
 - Help to identify local needs;
 - Inform policy development;
 - Provide evaluative feedback on local projects and plans; and
 - Develop a sense of local ownership and civic pride.
- 2.2 Evaluative studies¹ have highlighted a number of significant challenges that Local Planning Authorities experience in engaging and involving local communities in local planning processes, including:
 - Costs for participation and running involvement exercises;
 - The complexity of the planning issues under consideration;
 - Reaching hard to reach or seldom heard communities such as young people and older people;
 - Planning is often perceived as a remote bureaucratic process which does not encourage involvement;
 - Language of planning, with technical expressions and jargon can be a deterrent to involvement;

¹ Planning and Community Involvement: A guide to effective S106 agreements and Statements of Community Involvement Town and Country Planning Association (with The Rayne Foundation & Ethical property Foundation)

- Perception that planning consultation is dominated by highly vocalised local interest groups.

Community involvement in planning at the local level

- 2.3 There is an extensive legislative framework in place which governs community involvement in planning. There are statutory requirements for making information available about development plans and planning applications to ensure that local people can make appropriate representations on plans and planning applications.
- 2.4 The planning process is process driven, and planners need input from the public at certain points in plan making to ensure that statutory requirements are met. There are two categories of consultation at the local level:
- Local plan making process: each Local Planning Authority (LPA) is responsible for the preparation of Local Development Documents which make up the Local Development Framework (LDF).
 - Development Management: This is the decision-making process for planning applications.
- 2.5 A summary of the key local planning processes in which public consultation is sought are outlined in Appendix A.

Statements of Community Involvement

- 2.6 Local Planning Authorities are statutorily required to develop a Statement of Community Involvement (SCI). This is a document that sets out the framework for how the Local Planning Authority will engage with the public in preparing Local Development Plans in plan making and in commenting on planning applications.
- 2.7 The aim of the SCI is to set out the ways (e.g. how and when) the Local Planning Authority will consult on planning decisions and the plan making process. More specifically however, the SCI should encourage and support 'front loading' where consultation with the public begins at the earliest stages of each document's development to ensure that communities are given the fullest opportunity to participate in planning processes.
- 2.8 The SCI sets out a framework of minimum standards for community involvement standards that the Local Planning Authority will comply with in local planning processes.

Local Context

- 2.9 Haringey SCI (was initially adopted in 2007, but has since been updated in 2011). The SCI and the methods and processes of community involvement proposed within aim to reflect local demography and needs of local residents and communities. In addition, the SCI has been developed with reference to other key strategies and policy documents:
- Haringey Council Consultation Strategy: which sets out the guiding principles of how the Council will engage with local people;
 - Haringey COMPACT: an agreement between voluntary, community and statutory organisations on how they intend to engage and work with each other;
 - Council Equal Opportunities Policy.

- 2.10 As part of the plan making process, public consultations that are carried out are assessed against the SCI during the public examination of plans. Haringey's Core Strategy (now called the Local Plan Strategic policies) was found to be sound by the Planning Inspector who carried out the examination in Public including compliance with the SCI.
- 2.11 Together with other customer service functions, Haringey SCI was assessed as part of an external review of the Development Management Function.² It was concluded from this assessment that:
- There was a broad range of written guidance on the development management process available on and off line;
 - That service standards in the customer charter and SCI were not clear, were not monitored or reported upon;
 - There could be further improvement in the way neighbours and objectors are given clear, timely information about proposals and amendments.

3. Scrutiny aims, objectives and work-plan

Aims

- 3.1 The overarching aim of the EHSP was agreed as:

'To assess whether residents and communities have appropriate opportunities to engage meaningfully in local planning processes through community engagement and involvement strategies within the planning service (with particular reference to the Statement of Community Involvement).'

Objectives

- 3.2 Within the overarching aim, the EHSP agreed to address a number of key objectives, which were to assess:
- The Haringey Statement of Community Involvement (SCI) and make recommendations for development / improvement;
 - Community perceptions of local engagement and involvement for consultations for planning policy consultations and individual planning consultations;
 - The use of digital, new technology and social media as a means to engage and involve local residents and communities with planning development processes;
 - The need for local provision of education and training among local community groups to support engagement with local planning process (capacity building);
 - The role of members in community engagement, and consider ways in which they can be engaged in the pre-application process;
 - How recent legislative changes have impacted on community engagement.

Processes

- 3.3 The EHSP sought to meet the above objectives through the following processes:
- Discussions with local officers from Planning Policy and Development Management to establish local policy and practice;
 - Consultation with local community groups involved in local planning processes to assess engagement and involvement processes;

² Development Management (DM) Diagnostic review – Haringey Council 2013 (Regulatory Committee)

- Consulting other local authority planning services to draw on their comparative experiences and learning for community involvement;
- Consultation with specialist agencies to help identify good practice which may inform developments here in Haringey.

Work-plan

3.4 A range of information gathering methods were employed to ensure that the EHSP had access to evidence necessary to assist them in this investigation. This included:

- Desk based reviews (local policy and performance data);
- Formal panel meetings (to hear evidence from officers and to coordinate work programme)
- Informal evidence gathering sessions (with local stakeholders and other informed agencies);
- Primary data collection among those involved in community planning exercises (e.g. survey and focus group).

3.5 A range of stakeholders were involved in this project within the following themes:

Community	Local Policy & Practice	Comparative Policy & Practice
<ul style="list-style-type: none"> ▪ Community groups ▪ Conservation Area Advisory Committees ▪ Residents 	<ul style="list-style-type: none"> ▪ Haringey Planning Service 	<ul style="list-style-type: none"> ▪ Other Local Authorities (Islington, Hackney) ▪ Planning Aid for London ▪ Planning Advisory Service ▪ Dp9 Planning Consultants

3.6 As part of the work programme, the EHSP used the following methods to support the investigative process:

- *Formal panel meetings*: with planning officers;
- *Informal evidence gathering sessions* with specialist agencies and other local authorities
- *Community meetings* with local community groups, CAACs and resident associations (a list of all groups that attended is contained in **Appendix B**);
- *Survey* of local community groups, CAACs and resident associations (full analysis is contained in **Appendix C**).

3.7 The following table provides a summary of the panel work-plan in completing this project.

Aim	Purpose / Activity	Time line
Local Policy & Practice	A. Panel Meetings with Officers B. Evidence / Report from Planning Service C. Assessment of Haringey Statement of Community Involvement (Planning)	November 2013
Comparative Policy and Practice	A. Other planning authorities - Islington, Hackney B. Specialist Agencies - Planning Advisory Service - Planning Aid For London	January 2014
Community	A. Dedicated consultation event	February

feedback	B. Survey	2014
Developer perspectives	A. Dp9 – Planning Consultants	February 2014

4. Statement of Community Involvement

- 4.1 The panel noted that consultations on both planning applications and planning policy documents are subject to statutory consultation requirements. In addition, the principles and methods of local planning consultations are statutorily required to be set out in a local Statement of Community Involvement (SCI). The panel noted that the SCI is generally produced as a framework document to allow consultations to be tailored to the needs of the local community. The panel noted that the planning service would aim to exceed minimum consultation requirements detailed in the SCI, though this will depend on the type of consultation, the target consultees and resources available.
- 4.2 The panel noted that Haringey's SCI was first adopted in May 2007 and was subsequently reviewed again in February 2011 (due to changes in planning law). The panel noted that a further review is expected in 2014 to reflect legal requirements set out in the Localism Act (2011). The panel hope that its work would contribute to this review process.
- 4.3 National guidance³ issued in 2008 to Local Planning Authorities for the development of SCIs indicates that these should include:
- A clear explanation of the process and methods for community involvement for different types of documents (e.g. Development Plan, Supplementary Planning Guidance) and how diverse sections of community involved;
 - Details of those community groups that need to be involved at different stages of the process;
 - An explanation of the process and methods for effective community involvement in determining of planning applications;
 - Details of the Local Planning Authorities approach to pre-application discussions;
 - Details of the Local Planning Authorities approach to community involvement in planning obligations;
 - Information on how the SCI will be monitored, evaluated and scrutinised at the local level;
 - Details of where community groups can get further information on the planning process (e.g. Planning Aid);
 - How landowners and developer interests will be engaged.
- 4.4 Evaluative studies amongst community groups as to what makes an effective SCI have identified the following characteristics:
- Clear, written in plain English;
 - Clarity about the SCI and its role;
 - Practicality and usability: use of simple summaries, provision of examples (e.g. site notices, neighbour notifications);
 - Detail of priorities and resources available for community involvement;
 - Clear explanation of how the SCI will influence policy development;

³ Planning Policy Statement 12 – Local Spatial Planning DCLG 2008

- Engagement with the whole community especially hard for each or seldom heard groups.

Local perceptions of the SCI

4.5 The Panel sought the views of local community groups on the Haringey SCI via a survey and dedicated focus group. The survey sought to assess community groups awareness of this document, whether they had read or used it and if so, how useful it was. Analysis of survey data indicated that of those local community groups that responded:

- 55% were aware of the SCI;
- 35% had read the SCI;
- Of those who had read the SCI, 71% found it useful.

4.6 Qualitatively, local perceptions of the SCI were that it was not widely publicised and needed further promotion across the community, including greater prominence on the council website. Furthermore, there was a perception that the content was fairly turgid, and that a short summary document would be of benefit:

'Not publicised widely enough. Many residents are not aware of the statement or its implications.'

'The content is also fairly dense and needs to be simplified with summary to help guide readers through the processes.'

4.7 Of most concern to the community however, was the perception that the document was an aspiration for consultation rather than an implementable approach. Qualitatively, local community groups voiced scepticism as whether the community engagement or involvement processes described in the document are followed through in practice:

'... more a statement of intentions than a recipe for action.'

4.8 The panel noted that the SCI was of critical importance to local engagement as this document should set out the context, nature and approach of consultations undertaken by Local Planning Authorities. It was therefore of critical importance that the future re-assessment of the SCI is validated with the community to demonstrate that the prospective approaches to engagement and involvement are endorsed locally.

5. Local Planning Consultation framework

5.1 The panel noted that the Planning Service was committed to involving and consulting local people in planning processes and that the views of local people were important in shaping the future of the borough. Effective community involvement and consultation is fundamental to this process to ensure that decisions are reasoned, transparent and accountable to the community.

5.2 The Planning Service consults in the formulation of local planning policies. These would include major planning documents at the Core Strategy, as well as more specific policies for particular planning issues. Minimum requirements for consultations are set out by government, and the SCI provides additional methods

and approaches to help ensure community involvement is effective and reaches local stakeholders.

- 5.3 Different methods and requirements for consultation are required depending on the status of the planning document. For example, whether it is a Development Plan Document (DPD) or a Supplementary Planning Document (SPD):
- A DPD brings forward statutory local policy which requires at least two stages of community consultation and an independent examination;
 - An SPD provides further guidance for policies in DPDs and as such requires only one stage of community consultation and is not subject to an examination.
- 5.4 The panel noted that a variety of local stakeholders were involved at various stages of the plan making process and include:
- Statutory consultees (e.g. Mayor of London, neighbouring boroughs, Fire Service, Police Service, utilities, health, transport);
 - Representative bodies;
 - Community groups;
 - Business groups, planning agents and consultants;
 - Local residents and individuals.
- 5.5 The planning service maintains a database of local stakeholders and currently this has almost 1,500 entries. The database is updated every three years and this last occurred in 2012. In some cases the Planning Policy team will access other consultation databases to target groups or individuals for particular issues, for example the London Landlord Association database was used for consultation on the introduction of the Article 4 Direction.
- 5.6 The panel noted that Consultations should be flexible, accessible and tailored to meet the needs of consultees and the scope of the planning document. In this context, a wide range of consultative methods can be deployed to inform and engage local residents. These could include:
- On line surveys
 - Dedicated focus groups
 - Drop in sessions
 - Attendance at residents and community group meetings
 - Workshops
 - Area Fora
 - Street leafleting
 - Public road-shows, exhibitions, stalls.
- 5.7 It was noted that informal methods of consulting, such as drop-in sessions, public exhibitions and on street leafleting, have proved to be successful in engaging with individuals who have not been involved with planning before and who would otherwise not have the time or interest to submit a formal response to a consultation. Their views and issues are captured through these processes and, in some cases, participants will ask to be included in the consultation database to receive information on future consultations.
- 5.8 Notifications setting out when and how the Council will consult on a particular document are published through a variety of media including: local press; the Council's website; emails and letters to statutory consultees, all organisations, voluntary and community groups, and individuals on the Planning Policy consultation

database; the Council's consultation calendar; Haringey People (when appropriate); and information leaflets and posters (when appropriate). Printed documents are made available in public libraries and in the Planning Service office.

- 5.9 The panel noted that wherever possible, the Planning Service sought to work with established structures such as the Developers Forum, Conservation Area Advisory Committees, Tenants Forums and Residents' Associations which allow engagement with a wider audience.

6. Barriers to effective community engagement and involvement

- 6.1 From evidence presented to the panel via the community focus group and community survey, it was apparent that there were a number of issues that inhibited engagement and involvement by local community groups, residents associations and local residents in planning consultation processes. In summary, these included:
- The complexity and volume of planning processes;
 - Not recognising or utilising the community knowledge, skills and understanding of local issues in planning processes;
 - The need for greater transparency in planning processes (the role of the Planning Authority);
 - The need for greater trust and openness and joint working in local planning processes.

Volume and complexity of planning information

- 6.2 A significant problem for local residents and community groups for involvement in local planning consultations was the accessibility of planning documentation. The panel noted that many local groups and individuals struggled with the volume and complexity of planning documentation. In addition, potential contributors to planning consultations found it difficult to keep pace with new planning legislation and how reforms impacted on local planning policies and local development plans.
- 6.3 The panel noted that even well established community groups that had a good knowledge of national and local planning policies and were actively involved in local planning consultations, reported difficulties in keeping up to date with changes to the national, regional and local planning policy framework. It was noted that the complexity of planning policies and processes was such, that few individuals or groups had the necessary time or resources to meaningfully contribute to development management or planning policy consultations.

Under utilisation community knowledge and resources

- 6.4 It was emphasised to the panel, that local community groups should be recognised as a significant resource for local planning services given their detailed knowledge of geographical areas, local issues and experience of planning processes. A number of community groups consulted in this investigation suggested however, that to the detriment of local planning consultations and planning outcomes, communities were not as fully involved and engaged as they would like to be in local planning process.
- 6.5 The failure to fully capture local knowledge and understanding in planning processes had lead to a perception that the local Planning Service is too far removed from local communities. In this context, it was suggested that there was a need to further

involve local residents and assesses community opinion to ensure that this was factored in to final planning applications or planning policies.

Transparency

- 6.6 It was communicated to the panel that greater transparency in local planning processes would help to encourage and support further community engagement in local planning consultations. It was suggested that there was often a welter of supporting information within planning consultations which local residents found difficult to navigate and to draw out key facts from.
- 6.7 In addition, community groups were confused by the role of the Council in local planning processes, which outwardly appeared to straddle the interests of both developers and the community. Furthermore, many residents remained confused as to the role of the Council, local Planning Service and other council departments within planning consultations and would welcome greater clarity, particularly around:
- The strategic aims of the Council;
 - The role of interested parties being made clearer in planning processes;
 - The aims of individual consultations.

Openness, trust and joint working

- 6.8 During the consultation with community groups, it was apparent that a perceived lack of openness in previous planning processes had in some cases, led to a breakdown in trust between the community and local planning services and was an inhibitor to community involvement in local planning processes.
- 6.9 It was suggested to the panel that it was the Council's role to ensure that interested parties and stakeholders worked together for best effect in local planning processes and for the betterment of the community as a whole. At present, the perception was that there was too much 'head-to-head' in planning processes which has led to resources being wasted and under achievement of planning aims. It was suggested that the Council should adopt a more strategic approach to community engagement and involvement which included a:
- Clearer strategic vision for what the Council is trying to achieve;
 - More detailed assessment of community resources and how these can contribute to this vision;
 - More cooperation between interested parties (the planning service, local communities and developers).

7. Steps to improve community engagement

7.1 During the course of this investigation, the Panel have highlighted a number of areas for development that could further develop community engagement and involvement in planning processes. These were:

- Building the capacity of the community;
- Building the capacity of officers;
- Early involvement in planning process;
- Planning Performance Agreements;
- Improving the quality of planning proposals;
- Provision of feedback to participants in planning consultations;
- Adapting the approach and methods of community consultations;
- Further developing the role of members in local planning consultations;
- Improvement planning enforcement function;
- Greater use of new technology.

Building the capacity of the local community

7.2 The panel recognised, that as a priority, there should be a ongoing programme of capacity building for local community groups, Residents Associations, CAACs and residents to build links, confidence and trust between the Planning Service and the local community. Such a programme would be necessary to:

- Promote an understanding of the local planning process;
- Support community engagement and involvement in the development of planning policy;
- Support their input onto consultations on planned development;
- Further encourage the cascading of planning information and awareness within the community.

7.3 Evidence from the survey of community groups (Appendix C) recorded that there was a substantial appetite for community capacity building. Here it was noted that:

- 89% of respondents thought that more community based events (e.g. workshops) would be helpful to community engagement;
- 79% of respondents thought that more generic training on planning issues would be helpful to community engagement.

7.4 On the evidence presented in this investigation, the panel noted that community capacity building should focus on a number of areas:

- The provision of advice, information and training on generic planning policy issues as well as planning processes for consideration of individual planning proposals;
- Working with, and building the capacity of existing community networks;
- Draw on skills of existing community infrastructure;
- Increasing access to independent advice.

7.5 In evidence presented to the panel both the Planning Advisory Service and Planning Aid for London concurred that it was important that the local community represents a significant resource to local planning services, and where possible it should seek to harness such skills and expertise and local knowledge to the benefit of local planning processes.

7.6 In order to support meaningful engagement in consultations for new planning development or planning policies, the panel recognised the need to invest in training for local groups and residents. Through enhancing local planning knowledge, skills and understanding, the capacity of the community to engage, be involved and meaningfully contribute is increased. It is anticipated that such training could be cascaded more widely throughout the community.

Working with existing community networks

7.7 Evidence presented to the panel suggested that it was important to build the capacity within existing community groups. Both PAL and Islington Council indicated that they had worked with local voluntary sector umbrella groups (Voluntary Action Camden and Voluntary Action Islington) to help build local capacity to engage and be involved in local planning processes. It was also noted that community capacity building was an important step in supporting cultural change to encourage local community leadership and responsibility for planning issues.

7.8 In its evidence to the panel, the Planning Advisory Service recommended that community engagement and capacity building should be focused and objective and *properly evaluated* to ensure that what work is undertaken is done well and builds up positive experiences and confidence within the community (and encourage further participation in the future).

Independent Advice

7.9 Given the complexity of the local planning processes and the resources available to developers, it was suggested that as part of any capacity building programme, there should be improved access for the community to independent planning advice and support. The panel sought to assess the range of independent advice available to individuals and local communities to support their engagement with local planning processes. It was noted that there were a number of sources which included:

- Royal Town Planning Institute (RTPI) a charitable body supporting spatial, sustainable and inclusive planning;
- Planning Portal;
- Planning Advisory Service;
- Planning Aid for London.

7.10 The panel recommended that an advice sheet is developed for local residents and community groups in Haringey which provides details of those organisations from which independent planning advice can be obtained.

Building capacity of individual residents (small scale development)

7.11 There was a perception among those community groups consulted within this investigation that whilst community engagement and involvement for large scale developments was important and necessary, engagement and involvement on smaller scale developments in comparison often felt 'overlooked'. The panel noted that in this context, individual residents in neighbouring properties of proposed smaller developments 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

- 7.12 Thus in addition to building the capacity of community groups, it was suggested that there should be a mechanism through which individual residents can be signposted to local Residents Associations, community groups and other sources of planning information to ensure that planning knowledge, skills and understanding is cascaded widely in the community. Furthermore it was suggested that there should be:
- More information for local householders on the council website (particularly in the form of 'how to' guides to make applications and to contribute to consultations);
 - More guidance from planning officers as to what information is expected, or what issues are valid and can be considered within planning applications;
 - Signposting to independent planning advisory services.

Building the capacity of officers

- 7.13 The panel noted that the issue of capacity building also extends to the role of local planning officers, in that it may be necessary to build and extend the community engagement skills of local planning officers. Evidence to the panel suggested that it was rare for dedicated community engagement or consultation expertise within planning services and this is carried out generically within existing planning officer roles.
- 7.14 As part of the investigative process, Planning Advisory Service attended to give evidence to the panel. During this evidence, PAS representatives offered further training to local planning officers to help support community engagement and involvement function within the service. The panel hoped that such training would enhance consultation skills and practices of officers and develop the consultation capacity and expertise within the department as a whole.
- 7.15 The panel noted that there was there was substantive consultation experience and expertise across the Council in other departments (e.g. parking, adults service, CYP). It was suggested that planning officers should, where possible, draw on the consultation and engagement experience of these services and where appropriate, seek to develop such consultations in tandem (in particular transport and parking services).
- 7.16 A key finding from the survey and the consultation with local community groups was that the accessibility of local planning officers is a key factor in community engagement and involvement. Indeed, from the survey it was noted that 95% of respondents indicated that improved access to planning officers would support further participation in local planning processes (Appendix C).
- 7.17 From the consultation, community groups acknowledged that as a result of budgetary pressures, there had been a reduction in planning officers which evidently had created additional workload pressures for those that remained. It was apparent however, that the community wanted to see a further development in the way that local planning officers operated and worked with the community. It was suggested that local officers should:
- Have a developed knowledge and understanding of the local area, its issues as well as local resources (e.g. community groups);
 - Adopt an holistic approach to planning needs assessments in those areas and seek to involve a wider range of stakeholders in planning consultations;

- Have more mobility to ensure greater connectivity with the community, local issues and proposed developments;
- Offer local surgeries to improve access to advice and information on local planning processes.

Early involvement in planning process

7.18 National guidance updated through the National Planning Policy Framework,⁴ emphasises the importance of early and meaningful engagement in planning processes:

'Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.'

7.19 The panel noted that constructive pre-application discussions between potential applicants, planning officers and the community can help to ensure all relevant considerations are addressed before an application is formally submitted. Earlier opportunities for local stakeholders to engage and discuss proposals offers a number of potential benefits to the planning process:

- It can help to identify improvements needed to a scheme before it is formally considered;
- Improve the quality of the submitted application (for example, ensure that it is supported within development plans and conforms with local planning policies);
- Facilitate the speedier delivery of decisions, time and cost savings and higher quality development;
- Bring greater certainty into the process;
- Less pressurised timescales allows for greater community engagement and involvement.

Local perceptions

7.20 Within the focus group, there was a perception that the timescales for consultations for new development was insufficient to allow members of the public, residents and local community groups to read and absorb paperwork and to construct meaningful responses. It was suggested that there were a number of factors which were not given enough prominence in developing timeframes for 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 processes (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).

7.21 Analysis of both quantitative and qualitative data from the community suggested strong support for earlier involvement in consultations for new planning policies or

⁴ National Planning Policy Framework DCLG 2012

individual developments. Analysis of survey data found that 84% of respondents agreed that earlier notification of planning application proposals would improve community engagement (Appendix C).

7.22 Qualitative analysis would suggest that earlier engagement with the local community, particularly in relation to new development, would be most beneficial as this would allow more timely input into development proposals which may avoid later problems in the planning process:

'Early notification of proposed plans or changes is essential if people are to have time to respond.'

'Representatives of local community groups could be invited to attend pre-application advice meetings. We might then avoid having unsuitable designs inflicted on us, and address contentious issues at an early stage.'

7.23 Similarly, qualitative analysis also suggested that earlier consultation in the development of local planning policy would be helpful:

'To be consulted about new policies at an early stage and not just to find out about things when they are published as happened recently with the policy on basement extensions.'

7.24 In the focus group among community groups, the importance of pre-application consultation was also underlined to the panel. It was suggested that early stakeholder liaison had numerous benefits and communities welcomed early sight of development proposals and the opportunity to feedback and influence plans. It was pointed out to the panel however, there was inconsistent support and take up among developers for pre-application discussions and more should be done to encourage them to support and attend such fora.

Developers

7.25 The review also found support for early engagement in planning processes among developers. The panel noted that developers recognised the importance of early engagement where it was suggested that such early investment in local communities had a number of significant benefits:

- Allows more time for greater representation local stakeholders to be involved including community groups, local councillors as well as local residents;
- There was more time for meaningful engagement and for opinions to be canvassed fully and objections dealt with at an early stage;
- It minimises the risk of later (and more costly) legal challenge in the planning process.

7.26 It was also noted that it was important that developers were notified of key objections or problems with any proposed scheme as early as possible within planning processes, as this could allow for planned and timely solutions to be put in place. It was noted that significant delays can occur when:

- Local planning policies are not compliant (out of date, in need of updating);
- There is poor member engagement;
- Issues or objections being raised for the first time at Planning Committee.

Member involvement at pre-application stage

- 7.27 Traditionally, local Planning Services have been wary of involving councillors at any pre-application stage to avoid any notion of predetermination. It is recognised however, that members can play an important role in pre-application discussions as their involvement can assist the planning process through:
- Local knowledge (groups, representatives, area, history);
 - Their understanding and representation of community views;
 - The early identification of planning problems.
- 7.28 As a result of provisions within the Localism Act (2011) the panel noted that there was new probity guidance for Councillors and officers particularly in relation to the consideration of planning proposals at the pre-application stage. Provisions within the Act allow Councillors more freedom to engage, express their views and question the applications so long as this is done with an 'open-mind' and without pre-determination. This guidance recommends that in particular, Planning Committee members:
- Avoid expressing an overall view and indication of how they intend to vote;
 - Limit their questions to an understanding of the proposal;
 - Avoid asking questions which could not be viewed as having a closed mind.
- 7.29 In written evidence submitted to the panel, it noted that a number of other London Authorities had established pre-application consultation processes in which members were involved:
- *Camden* – Development Management Fora that enable local residents, business and organisations to comment on proposals at an early stage. Members and officers attend but do not express any opinions on the merits of the proposal.
 - *Croydon* – operate a Strategic Planning Committee for major planning applications (both at pre-application and decision). Members receive presentations from developers, though avoid giving an opinion on the scheme as a whole;
 - *Lambeth* – operate a strategic non-decision making panel where members and senior officers are briefed on major development proposals at pre-application stage.
- 7.30 Evidence from other authorities indicated that it was often difficult for people to meaningfully engage at the pre-application stage, particularly when plans may be still in their infancy and fully worked up (i.e. exactly what it planned, what this will it look like and what impact that it may have in the community). This required the need for pre-application protocols around the provision and exchange of information.
- 7.31 The panel noted that a review of the current member protocol for involvement in pre-application planning processes is scheduled for 2014 which will draw on experience and best practice in other authorities and evidence emerging from this review.
- 7.32 The panel noted that as part of this process it would be essential to establish rules of engagement for developers, members and the local community at the pre-application stage. In this context, the panel noted the recent joint publication by the Local

Government Association and British Property Federation: *10 Commitments for effective pre-application engagement*,⁵ which covered the following areas:

- Parameters of consultation (timing, proportionality);
- Open exchange of information;
- Collaborative working to find deliverable outcomes;
- The need to involve members;
- Need to keep a record of meetings held.

7.33 In addition, it was noted that Planning Advisory Service was intending to provide further support to local authorities to develop and improve local pre-application processes. It was envisaged that this support would consist of a programme of workshops that could be operated locally, to help services evaluate and improve existing pre-application processes.

Planning Performance Agreements

7.34 The panel noted that it can be difficult to determine planning applications within the statutory timeframe, particularly 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 developers can allow decisions to be taken outside the statutory timeframe.

7.35 The panel noted that Planning Performance Agreements (PPAs) are essentially a project management process and tool to improve the quality of major planning applications. PPAs can provide greater certainty and transparency in the development of major schemes, particularly in relation to the assessment of the planning applications and in the decision making process. PPAs 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).

Improving the quality of planning proposals

7.36 Survey and focus group evidence presented to the panel suggested that an improvement in the quality of planning proposals would be beneficial to community involvement in local planning processes. Data from the survey indicated that just:

- 50% of responding community groups were satisfied with accessibility or readability of planning documents;
- 39% were satisfied with the quality of planning consultation documents (Appendix C).

7.37 The panel noted evidence from Planning Aid for London on the work that had been undertaken in a neighbouring authority to improve the quality of planning applications submitted. Every developer and every agent working in the borough were consulted to identify those planning issues of most concern for which a pre-application information guidance (Top Ten Issues) were developed. Through involving local developers, it was hoped that this would improve the quality of submissions (given that this was what was agreed) and help to minimise later enforcement action as this

⁵ 10 Commitments for effective pre-application engagement, Local Government Association (2014)

guide would set out 'up front' what is needed and expected from developers. It was noted that this process could also help to speed up the planning process.

Feedback from consultations / proposals

7.38 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 was a weakness in local planning processes, 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.

7.39 Analysis of data obtained from community groups via the focus group and survey would appear to verify this assessment. Qualitative analysis would appear to suggest that little feedback is provided to contributors to planning consultations which makes it difficult to determine the usefulness of submissions and how this has impacted on final plans:

'Often the designated planning officer does not mention comments in her/his report.... .'

'Consultation should directly involve residents and the results need to be made transparent.... .'

'Community Engagement would be improved if the Council were to publish and explain the reasons for their decisions when they are contrary to the views expressed through this process.'

7.40 In this context, many community groups indicated that this gave rise to considerable local frustration as it was not clear if submissions had been noted or indeed were useful to planning officers, and that overall this suggested that consultations were not a two way process:

'... if you call it a consultation it must be one. It is a two way process or don't bother.'

'The consultation process is a charade. While it is easy to comment online on planning applications, local residents' opinions seem to be totally ignored. One questions whether the planning officers read them.'

7.41 Respondents suggested that if it was apparent that consultation contributions had been assessed and recorded where these had influenced planning decisions, this would encourage further participation:

'[Our community group would be more involved] if they felt that their comments were taken more seriously. It is often the case that the comments submitted by this CAAC for example are not mentioned at all in a planning officer's report.....'

- 7.42 The panel noted that it was important to demonstrate the impact consultation with local residents and community groups had had upon individual planning proposals and that it was important to provide a mechanism for such feedback to:
- Provide reassurance to participants that contributions were useful, valid and contributed to the planning process;
 - Provide a guide to potential participants future in planning consultations;
 - Facilitate further community engagement in the future;
 - Manage the expectations of the community.
- 7.43 The panel were keen to see the development of a systematic process in which contributions to planning consultations were accurately noted and if these had been of material influence to final planning proposals.
- 7.44 In evidence from the planning consultant, the panel noted that it was equally important for developers to receive feedback on planned developments from numerous council services (e.g. 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 important that there is coordinated multidisciplinary feedback on proposed development which is both timely and coherent.

Adapting consultation methods

- 7.45 The survey administered to community groups sought to assess the use and perception of consultative methods used by the planning service. The key quantitative findings from this survey indicated that the consultation methods that respondents found were most helpful were:
- Residents meetings (38% agreed these were very helpful or helpful);
 - Development Management Fora (34%); and
 - Planning Workshops (27%).
- 7.46 Qualitative analysis of responses gave a more detailed assessment of some of the consultation methods used within the Planning Service. Quantitatively, 34% respondents indicated that it was unhelpful to use Area Fora as a medium through which to conduct planning consultations and this was substantiated in qualitative comments provided within the survey:
- 'The Area Forum is not an appropriate forum to gather consultation opinions due to the shortage of time and need to follow a set agenda which means residents are unable to speak freely. It should be used to publicise proposed developments instead and events.'*
- 'The Area Forums are a good idea in principle... must be a total waste of public money and time. There are always more officers and Councillors than members of the public. Those few who attend are the same as make their voices heard anyway. The local publicity for these is also very poor – i.e. emailed posters not sent till almost last minute.'*
- 7.47 In contrast, respondents were more satisfied with dedicated planning forums such as Development Management Forums which are operated to support large scale developments. Survey respondents were generally pleased with this process, though it was suggested that they could be offered more frequently:

'The Local Development Forums can be extremely useful and we hope that these will continue.'

'... DMFs held which are also not frequent enough.'

7.48 In addition, there was a perception that there was too great a reliance on digital and on-line response for planning consultations which may exclude those who did not have access to digital systems. This creates a disconnect between people and the areas in which the development proposals are centred:

'Web-based material is useful, but not readily accessible to many residents.'

'Consultations tend to rely far too much on internet access. As noted at the meeting, not everyone has access nor do they wish to participate in this form.'

7.49 Given the complexity of planning issues, it was suggested that greater use should be made of more participative consultation engagement methods, such as face to face meetings with planning officers and community consultation events (such as workshops). It was also noted that such an approach would also help local planning officers to build knowledge and understanding of local issues and further extend contact with local community groups and residents associations. This was verified in survey responses:

'More, localised, Public Meetings would be an advantage... .'

'Residents have strong views about planning issues and welcome opportunities to discuss planning matters, rather than simply responding in writing.'

'Meetings and personal contact with genuine discussions.... .'

Evaluation

7.50 Perhaps more importantly, it was suggested that it was important to evaluate the methods used in consultations, and to maintain an organisational record of the approaches adopted to engage and involve the community. This would help to improve organisational awareness of successful methods or approaches, or those that require further adaptation. Without this analysis, the organisation is liable to continued repetition of ineffective consultation processes. Such records will also help to establish the journey that the Planning Service has embarked upon in relation to community engagement and involvement and guide and inform future processes.

Member involvement (general)

7.51 The panel noted that local councillors play an important role in local planning processes as they embrace a number of key roles:

- Strategic leadership: setting the vision and direction;
- Plan making: to reflect local values and priorities in policies;
- Ward level representation: representing local views;
- Neighbourhood planning - link between community and the council and council services.

7.52 In addition, the panel noted that local councillors have a particularly important role in Development Management to help ensure that:

- Involvement with the community and developers is at an early stage;

- Areas of local concern are raised;
- There is an informed debate on the issues presented;
- A wide range of issues and material considerations are considered in helping to make the right decision.

7.53 It was also noted within survey responses that, in recognition of the important role that local councillors play in supporting community engagement with planning processes, further training for them may also help to promote greater understanding of planning issues within the community:

'The Planning Process is complex and difficult to understand. Not only should residents be given clear, readable information but local ward councillors must be trained in the Planning system.'

7.54 The need to support members in their advocacy / champion role in planning consultation was highlighted to the panel by both the Planning Advisory Service and Planning Aid for London. It was suggested that a dedicated web page for members (and the community) on how to support individual and local community groups through the planning consultation process could assist members in community engagement in planning processes. In relation to member development, the panel noted that there was a Councillor area on the Planning Advisory Service website which provided briefings, updates and training to support their role in local planning processes.

7.55 To conclude, the panel noted that there were three issues for member development:

- That greater use could be made of the existing knowledge and skills of local councillors in planning consultations and processes;
- The need to further publicise to members the planning resources available to them (e.g. website, publications, public advice services) to support their role in community planning processes (e.g. liaison with local residents and groups);
- The need for further ongoing tiered training on the role of members in local planning processes should be made available to support members role (as above).

Improved planning Enforcement

7.56 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 appeared powerless to stop. It was suggested that retrospective planning applications were being used which in effect, bypassed local consultation and scrutiny and which left local residents and community groups feeling frustrated and disengaged.

7.57 Dissatisfaction with the planning enforcement function was also raised within the survey. It was suggested that improved arrangements for reporting planning infringements could help build community trust and engagement:

'The survey should also include community engagement with Planning Enforcement, an area which desperately needs to be addressed and which Noel Park has been badly let down on.'

‘Enforcement is a real problem. We notify Haringey of infringements and then very little happens. This is discouraging to say the least.’

- 7.58 The panel noted that in other boroughs (e.g. Westminster) an additional condition is placed on granting planning applications which requires applicants (particularly of larger schemes) to place a copy of the decision notice on the site premises during construction. The panel noted that this approach could help to facilitate community inspection and monitoring and where necessary, enforcement and recommended that it should be considered in Haringey.
- 7.59 In addition, the panel indicated that it was undertaking a similar investigation in to the enforcement functions of the Council and had made recommendations to support a more strategic approach. The panel have made recommendations in this report⁶ which will hopefully lead to improved enforcement outcomes, including:
- Improved arrangements for sharing enforcement information;
 - Better local enforcement partnerships;
 - Improved surveillance systems.

New technologies

Website

- 7.60 The panel discussed the use of the website as a tool through which to provide planning information. A wide range of planning information is contained on the site, including local planning policies, planning proposals and planning advice. Whilst it was acknowledged that there was a lot of information on the website and that improvements have been made, that further work to improve the content and accessibility should be undertaken.
- 7.61 Feedback from the focus group and survey would indicate that further work may need to be undertaken to improve the accessibility of the website. Whilst over 2/3 (68%) of respondents indicated that they found planning information on the council website useful, there were technical difficulties and layout issues in accessing certain planning documents:

‘... some documents are not easy to use on line, there can be problems for Mac users.’

‘With regard to the planning applications on the website, there could be better labelling of the pdfs. Sometimes there is no labelling at all... and it can take a long time to find the relevant one. It would also be useful if the pdfs containing comments from the statutory consultees or the design officer could be marked accordingly.’

- 7.62 The panel noted in evidence from community associations, 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:

⁶ Strategic Enforcement – Final Report of the Environment and Housing Scrutiny Panel available at: haringey.gov.uk

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

7.63 It was clear that there was a strong appetite for more web based information in the community. Survey analysis demonstrated that 95% of community respondents wanted more information about planning services on the website (appendix C).

7.64 Panel members noted that whilst digitalisation clearly offers numerous potential benefits to assist community engagement and involvement in local planning processes, there was an underlying concern about the accessibility of digital systems to a significant proportion of local residents, particularly the elderly, socially and economically disadvantaged and non-English speaking groups. The 'digital by default' approach would omit those 20% of residents who were not connected to the internet or other digital media.

7.65 Whilst it was acknowledged that web based technologies were an important tool for community engagement and involvement, the community were keen to ensure that such methods or approaches were continued to be augmented by more traditional approaches (e.g. written notifications, face to face consultations, notices on lamp-posts).

Geographical Information Systems

7.66 On evidence received to the panel it was suggested that Geographical Information Systems (*GIS*) could be used to provide greater assistance in local planning consultation processes. It was noted that GIS technologies could assist:

- The community to identify planning applications and other planning information (Conservation Areas, Tree Preservation);
- More systematic notification of planning applications to the community.

7.67 It was noted that two other neighbouring authorities (Islington and Camden) had incorporated GIS within notification processes for development management. It was also noted that Wiltshire County Council uses GIS to map local planning information (e.g. conservation areas, flood zones, listed buildings, tree preservation orders) alongside local planning applications.

7.68 The panel noted that the planned review of the SCI would include an assessment of new methods of engagement, particularly the use of more interactive online tools, such as SNAP surveys and online discussion forums. The panel noted that the service is trialling a SNAP survey tool which not only allows for on-line consultation, but can also record and note responses and non-responses.

7.69 In addition, the panel noted that the Planning Service would be working with IT services to ensure that there was provision for local residents to receive email notifications of planning applications and other planning proposals through the development of 'My Haringey' portal.

Appendix A – Planning Framework and opportunities for community involvement in planning⁷

National Planning Policy

- Wider stakeholder involvement in the preparation of draft policy statements and guidance.
- Government White papers on policy proposals issued for public consultation.
- Planning Policy Statements and other guidance documents issued in draft for public consultation.
- Draft regulations issued for public consultation.

Regional Spatial Strategies (as supported by Mayor of London)

- Focus group on project plan for RSS revision.
- Focus groups of stakeholders, consultation seminars and other opportunities to be involved in emerging issues and options for draft RSS revision.
- Formal opportunities to make representations when draft revision of RSS is submitted to the Secretary of State.
- Examination in public into the draft RSS revision.
- Opportunities to make representations on changes to the RSS revisions proposed by the Secretary of State.

Local Development Documents (as supported by Local Planning Authority)

- Statement of Community Involvement sets out the Local Planning Authority's policy on involving the community in the preparation of its Local Development Documents.
- Early dialogue on LDDs, in line with the SCI.
- Before draft proposals are finalised, the authority will formally publish its preferred options for consultation and must consider representations.
- Draft Development Plan Documents are published and submitted for public examination. Representations can be made, to be considered at the examination.
- Those making representations seeking changes to a DPD will have a right to appear in person at the examination.
- Inspector's report will be made available for public inspection.
- Annual monitoring report published by local authority.

Planning Applications (as supported by Local Planning Authority)

- The SCI will set out the LPA's proposals for consulting the community on planning applications.
- Third parties can make representations on planning applications.
- Objectors can speak at Planning Committee meetings at the discretion of the LPA.
- Reasons for decisions are published.
- Third parties can make representations on appeals and at inquiries into called in applications.
- Additional consultation with regional and national bodies where appropriate for Major Infrastructure Projects.

⁷ Community Involvement in Planning: the Governments objectives Office of Deputy Prime Minister (2004)

Appendix B – Community groups participating in the focus group

Bowes Park Community Association
Bounds Green District Residents Association
Wards Corner Community Coalition
Haringey Federation of Residents Associations
Our Tottenham Network
Highgate Society
Alexandra Ward Mobility Group
Freeholder Community Association
Parkside Malvern Residents Associations
Pinkham Way Alliance
West Green Residents Association
Tottenham CAAC

Environment & Housing Scrutiny Panel

Community Engagement and Planning Services

Survey Analysis

March 2014

1. Introduction

1.1 As part of the work programme for 2013/14, the Environment & Housing Scrutiny Panel (EHSP) agreed to look at how the Haringey Planning Service engages and involves local residents and community groups in planning processes.

1.2 The overarching aim of this work was agreed as follows:

'To assess whether local residents and community groups have appropriate opportunities to engage meaningfully in planning processes through the community engagement and involvement strategies of the Local Planning Authority.'

1.3 Within this, the EHSP agreed to address a number of specific objectives including:

- To assess the nature and scope of community consultation and involvement in planning processes (including local standards, how these are measured, monitored and published);
- To assess the Haringey Statement of Community Involvement (SCI) and make recommendations for development / improvement;
- To assess whether there is appropriate education and training for local community groups to support engagement and involvement in local planning processes;
- Identify opportunities for the further development of digital, new technology and social media within community engagement and involvement strategies;
- To evaluate community perceptions of local engagement and involvement within the planning process;
- To assess the impact of recent legislative and policy changes for community engagement and involvement in the planning sector and how these are reflected in local arrangements.

1.4 To support this work, the EHSP held a number of dedicated evidence gathering sessions as set out below:

1. Local Policy and Practice (November 2013)	<ul style="list-style-type: none">▪ AD Planning,▪ Planning Policy Officers,▪ Development Management Officers
2. Comparative Policy and Practice (January 2014)	<ul style="list-style-type: none">▪ Planning Aid For London▪ Planning Advisory Service▪ Islington / Hackney
3. Community stakeholders (February 2014)	<ul style="list-style-type: none">▪ Consultation with community groups

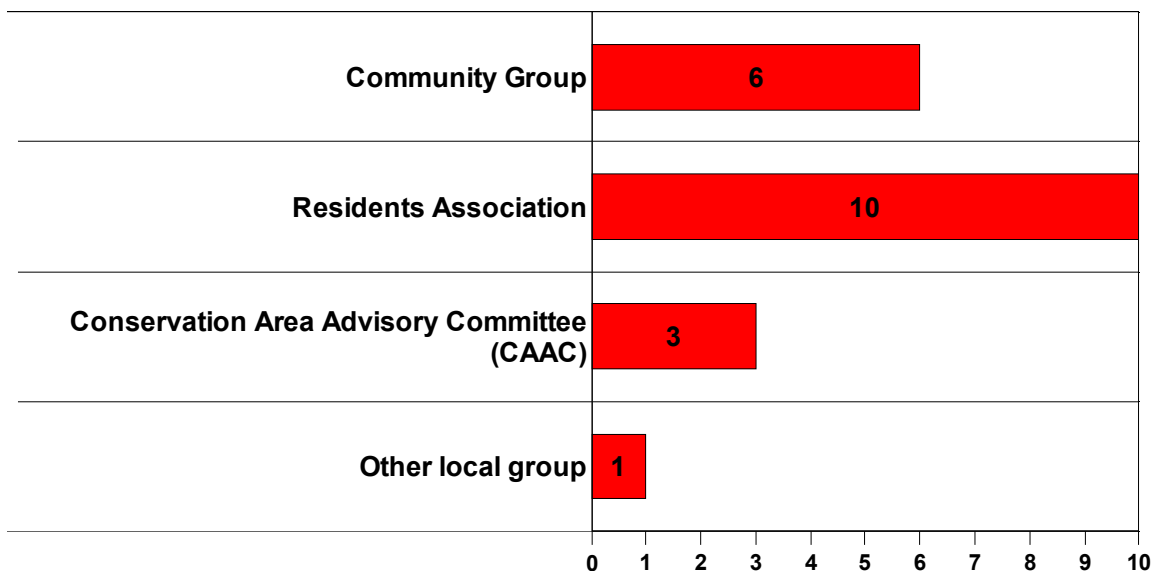
1.5 A dedicated evidence gathering session was held with local community groups on 18th February 2014 at which representatives from community groups and residents associations attended. The purpose of this meeting was to enable local groups to feedback on their experiences of involvement within local planning consultations and to identify priorities for improvement.

1.6 To support its involvement of local community groups in this work, a short on-line survey was created and distributed to those groups on the Planning Service Consultation database and all local residents associations. This report provides a summary of the quantitative and qualitative analysis of the 20 responses received.

2.0 Survey analysis

2.1 The on-line survey was distributed to 42 community groups contained on the planning consultation database. In total, 20 responses were received by the deadline date to be included within this analysis. Responses were received from a variety of local groups including Residents Associations, community groups and Conservation Area Advisory Committees (Figure 1).

Figure 1 - Source of survey response (n=20)



Statement of Community Involvement (SCI)

2.2 The SCI sets out a framework of minimum standards for community engagement and involvement that the Local Planning Authority will comply with in local planning processes. The survey sought to assess community groups awareness of this document, whether they had read or used it and if so, how useful it was.

2.3 In total, 11 of the 20 (55%) community groups that responded indicated that they were aware of the SCI (Figure 2). Analysis of qualitative data would suggest that this document is not publicised widely enough and is difficult to locate on the Council website:

'Not publicised widely enough. Many residents are not aware of the statement or its implications.'

'Not publicised.'

'..... we were unable to find the Statement of Community Involvement on the website.'

2.4 Of those nine respondents who were aware of SCI, seven (78%) had read or used the document (Figure 3). Analysis of qualitative comments would suggest that some community groups found the SCI difficult to access, and that it would be of benefit if summarised version was available:

'The content is also fairly dense and needs to be simplified with summary to help guide readers through the processes.'

Figure 2 - Respondents aware of Statement of Community Involvement (n=20)?

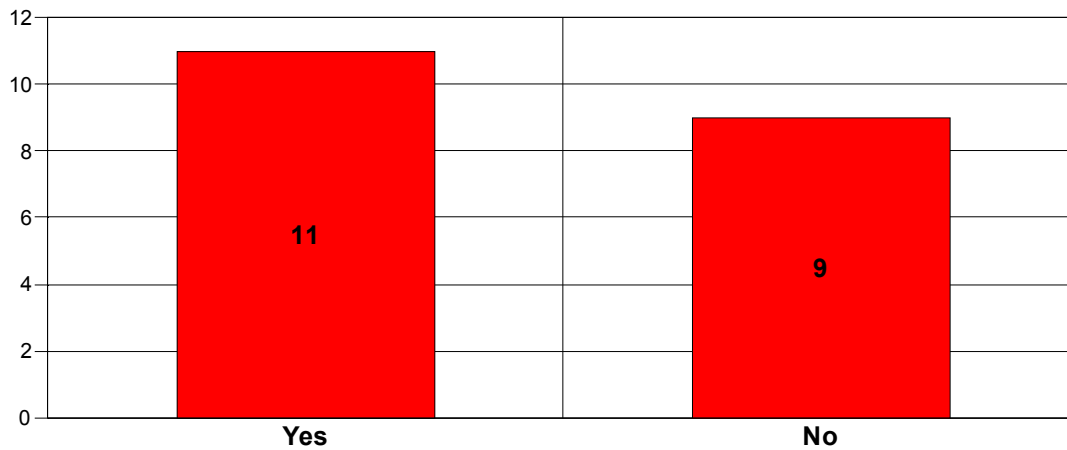
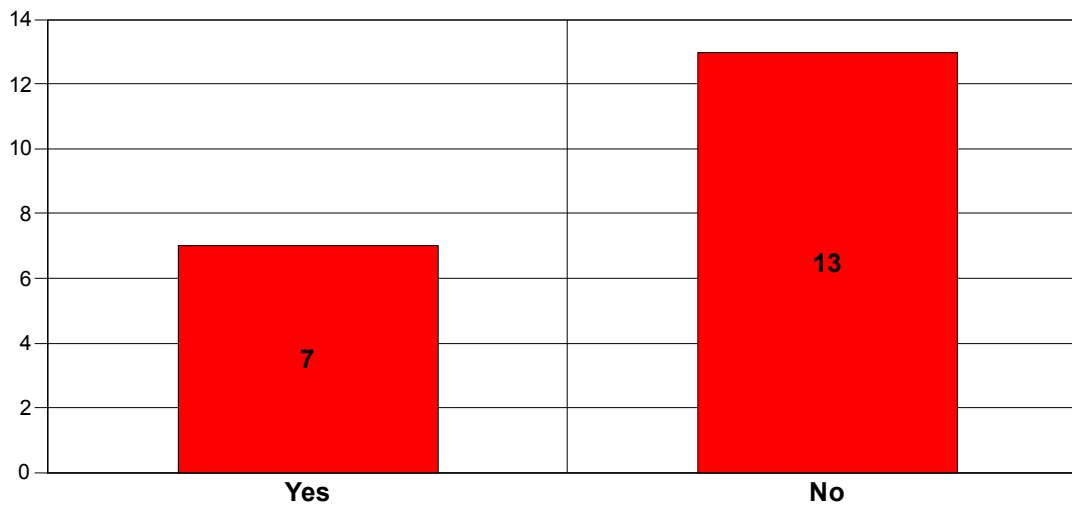


Figure 3 - Respondents indicating that they had read or used Haringey Statement of Community Involvement (N=20)



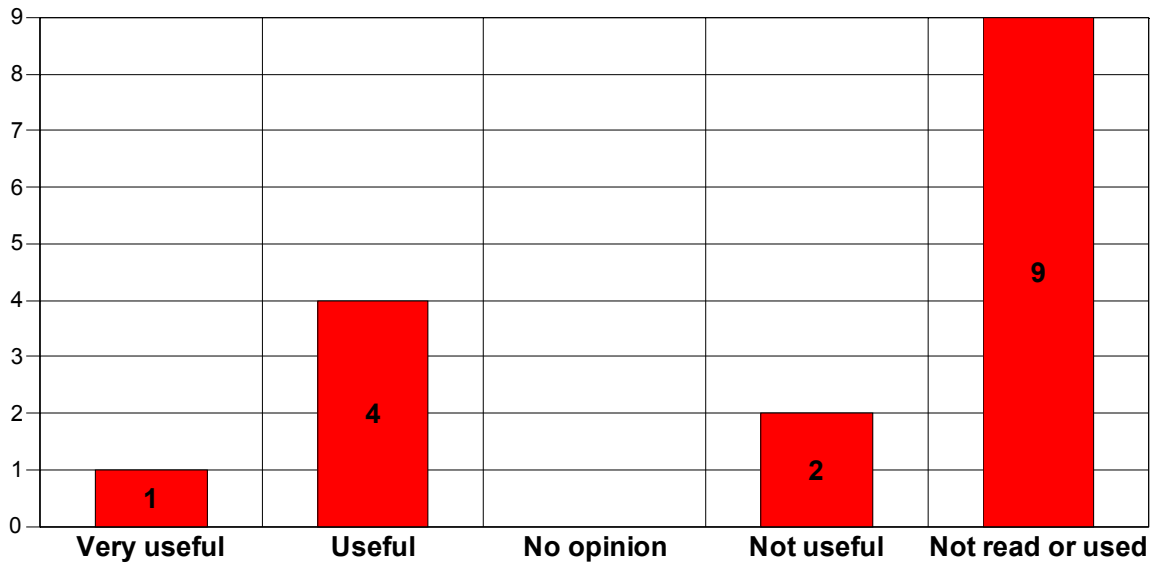
2.5 Of those seven respondents who had read the SCI, five (71%) found it either 'very useful' or 'useful' (Figure 4). Analysis of qualitative responses would suggest that there is some scepticism as whether the community engagement or involvement processes described in the document are followed through in practice:

'Have just looked at it.. and good in theory but in practice?'

'.... more a statement of intentions than a recipe for action.'

'Haringey planners need to read it and it should do what it says on the tin.'

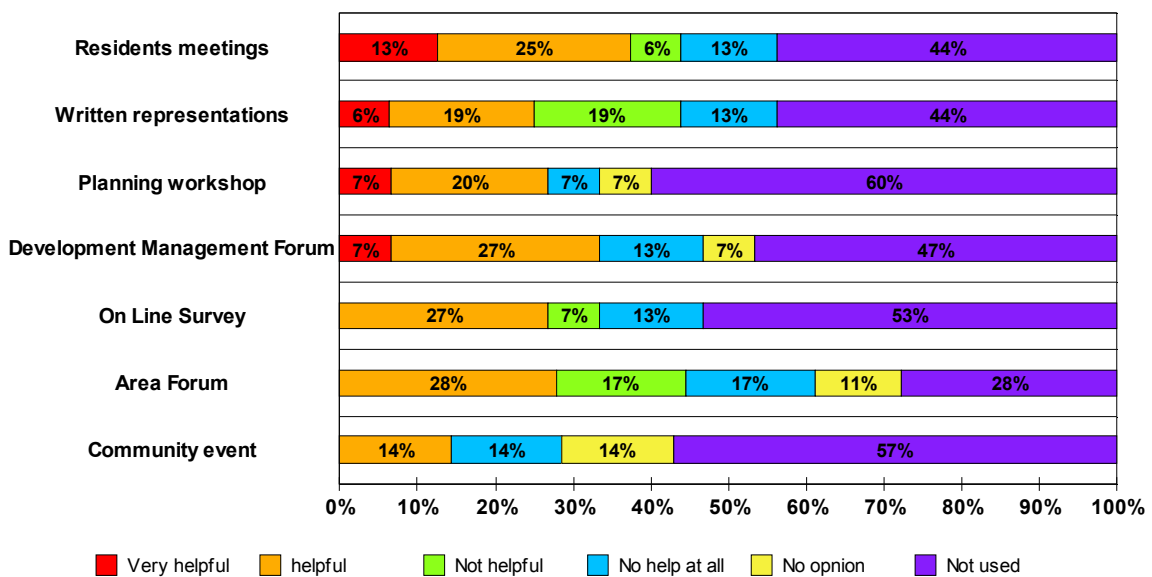
Figure 4 - How useful was the Statement of Community Involvement (n=16)?



Consultation methods

- 2.6 The survey sought to assess the consultation methods in which local community groups had been involved and perceptions of how helpful these were to planning processes. Almost ¾ (73%) of respondents had participated in a planning consultation at a local Area Forum, though on the whole, the survey would appear to suggest low levels of engagement with other consultation methods (Figure 5).
- 2.7 The consultation methods that respondents indicated were most helpful included residents meetings (38% agreed these were very helpful or helpful), Development Management Forums (34%) and Planning Workshops (27%) (Figure 5).

Figure 5 - Use and perception of local consultation methods (n=20).



2.8 Further analysis of qualitative responses give a more detailed assessment of some of the consultation methods used within the planning service. Quantitatively, 34% respondents indicated that it was unhelpful to use **Area Forums** as a medium through which to conduct planning consultations and this was substantiated in qualitative comments provided within the survey:

'The Area Forum is not an appropriate forum to gather consultation opinions due to the shortage of time and need to follow a set agenda which means residents are unable to speak freely. It should be used to publicise proposed developments instead and events.'

'The Area Forums are a good idea in principle... must be a total waste of public money and time. There are always more officers and Councillors than members of the public. Those few who attend are the same as make their voices heard anyway. The local publicity for these is also very poor – i.e. emailed posters not sent till almost last minute.'

2.9 Contrastingly, respondents were more satisfied with dedicated planning forums such as **Development Management Forums** which are operated to support large scale developments.

'Development forums are very helpful.'

'The Local Development Forums can be extremely useful and we hope that these will continue.'

2.10 There was a perception however among some respondents, that Development Management Forums could be held more frequently:

'... DMFs held which are also not frequent enough.'

2.11 Further data analysis would suggest that there is too greater reliance on **digital and on-line** responses for planning consultations which may exclude those who are not digitally connected and which disconnects people from the areas and proposals on which they are commenting:

'Web-based material is useful, but not readily accessible to many residents.'

'The effect of on line surveys is very hard to gauge.'

'Consultations tend to rely far too much on internet access. As noted at the meeting, not everyone has access nor do they wish to participate in this form.'

2.12 On the whole, respondents would appear to demonstrate a preference for more **participative methods of consultation** in which local communities could physically meet and discuss planning proposals with planning officers:

'More, localised, Public Meetings would be an advantage... .'

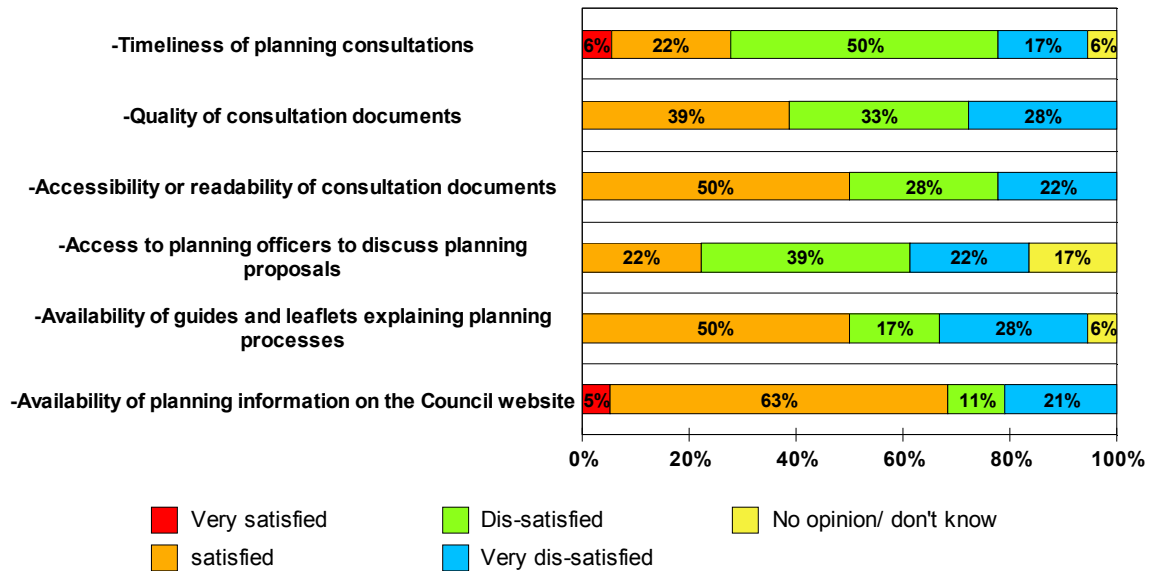
'Residents have strong views about planning issues and welcome opportunities to discuss planning matters, rather than simply responding in writing.'

'Meetings and personal contact with genuine discussions.... .'

Overall satisfaction with planning consultations

2.12 Respondents were asked to indicate how satisfied they were with aspects of the planning consultation process such as the timeliness of consultations, quality of consultation documentation and access to planning officers. These responses are summarised in Figure 6.

Figure 6 - Overall satisfaction with aspects of plannign consultations (n=16)



2.13 Over 2/3 (68%) of respondents indicated that they found planning information on the **council website** useful (Figure 6). Whilst some respondents indicated that there were some technical difficulties in accessing certain planning documents on the website, overall there appeared to be a general satisfaction with information available on the website:

'.... some documents are not easy to use on line, there can be problems for Mac users.'

'I think information on council website is very good, Very pleased that CAAC minutes and annual reports are on council website. Thanks.'

2.14 One suggested improvement that could enhance the accessibility of planning documentation on the website was better **labelling of consultation submissions** or comments received for individual applications:

'With regard to the planning applications on the website, there could be better labelling of the PDFs. Sometimes there is no labelling at all... and it can take a long time to find the relevant one. It would also be useful if the PDFs containing comments from the statutory consultees or the design officer could be marked accordingly.'

2.15 Analysis of quantitative responses also indicated that two-thirds of respondents were dissatisfied (67%) with the **timeliness of planning consultations** (Figure 6). This was verified in qualitative responses where respondents indicated that there was insufficient time to respond to development notifications:

'If [we] do get a letter then the deadline for responding is almost up. We are notified too late.'

'21 days is not long enough for comment to be made.'

'If you are on holiday or away, you may be too late to provide input.'

2.16 There was also a perception that there was insufficient time given to respond to major development proposals:

'An example of a current method is the Site Allocations DPD which I was told about on 20 January for consultation until 7 March. This is a very short time for such a central policy proposal.'

2.17 Survey analysis indicated that just 39% of respondents were satisfied with the **quality of documentation** for planning consultations (Figure 6). Analysis of qualitative comments would suggest that the main concerns that potential contributors with planning consultations was that documentation did not give enough detail or that information which was submitted was incomplete:

'Documentation supplied by applicants often contain insufficient detail with poorly drawn or no plans.'

'There are often examples where the description of the proposed development is incomplete and quite important aspects of the development are just left out entirely. The planning officers should check the description against the submitted drawings and not just the information provided in the application form.'

2.18 Whilst 50% of respondents indicated that they were satisfied with the accessibility or readability of planning consultation documentation (Figure 6), qualitative analysis would suggest however that there was too great an **emphasis placed on digital distribution** of planning documentation and that physical access to hard copies of planning documentation could be improved:

'Applications are not sufficiently well publicised. Too much reliance is placed on online dissemination and merely having the documentation at libraries is insufficient.'

'More active information so that we don't have to search out.'

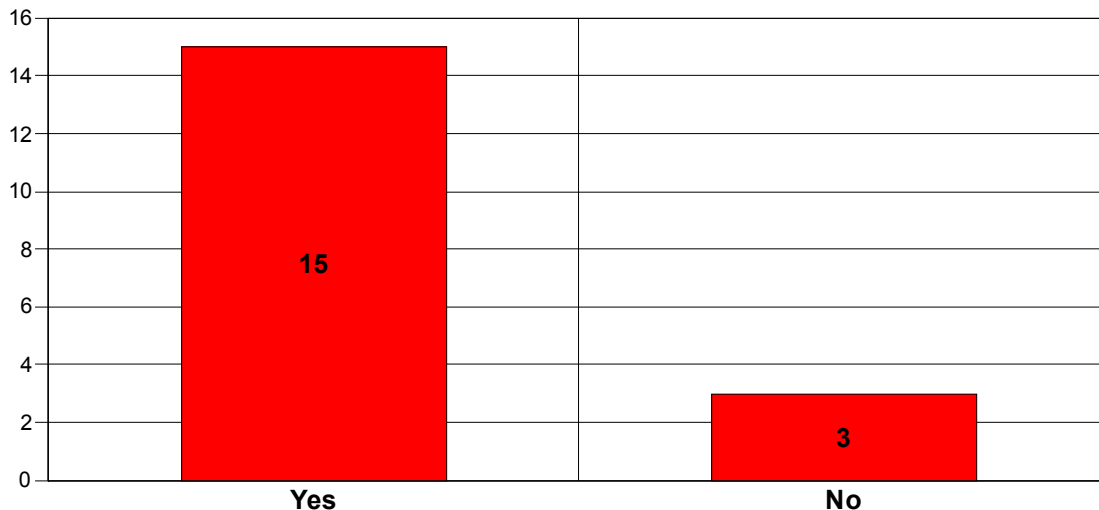
'..... it is essential that any supporting documentation should be made available in 'hard copy'.'

More involvement in Planning Consultations

2.19 Quantitative analysis indicated that 15 out of 18 respondents (83%) would like to be more involved in local planning consultations (Figure 7). Analysis of qualitative data would indicate that local community groups and residents associations contain many informed individuals who are familiar with planning systems and want to play a more active role. Of particular note, analysis suggested that the community should be seen as a resource and that local residents could help to provide key local information to support planning officers and planning processes:

'We can easily supply specific information re an application because of our local knowledge; context of proposals not easy for officers to understand on occasion.'

Figure 7 - Would your community group like to be more involved in planning consultations (n=18)?



2.20 Respondents also indicated that it would be useful if **planning officers** could attend local meetings to discuss consultations for local planning applications or planning policies, particularly as group members may not have the confidence to attend official planning meetings:

'Discussion with officers at our meetings.'

'Planning Officers to be available to attend group meetings.'

'... planning officers coming to our meetings. Many people are too nervous to go to official meetings.'

Factors to help improve community engagement and involvement

2.21 Respondents were asked to indicate what practical steps could be taken to improve community engagement within planning consultations. Quantitative analysis indicated that the most favoured way to improve community engagement for planning consultations was earlier notification of planning application proposals where 84% of respondents indicated that this would be helpful (Figure 8).

2.22 Analysis of qualitative comments would suggest that **earlier engagement** with the local community, particularly in relation to new development would be most beneficial as this would allow more timely input into proposed development which may avoid later problems in the planning application process:

'Early notification of proposed plans or changes is essential if people are to have time to respond.'

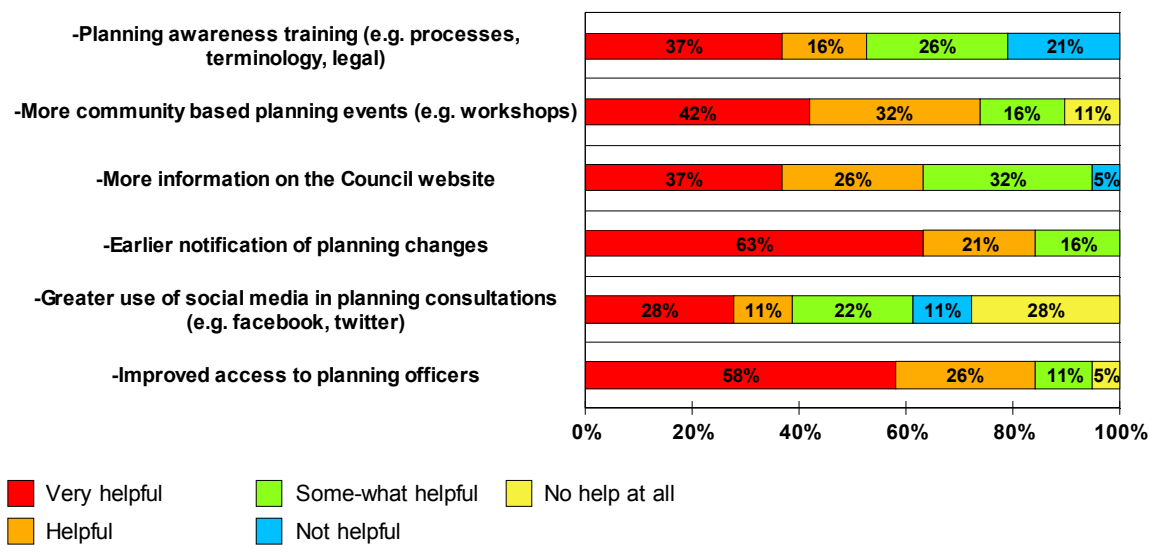
'Engage with applicant at pre-application stage.'

'Representatives of local community groups could be invited to attend pre-application advice meetings. We might then avoid having unsuitable designs inflicted on us, and address contentious issues at an early stage.'

2.23 Qualitative analysis also suggested that almost all (100%) respondents to some degree, would welcome earlier consultation in the development of local planning policy:

'To be consulted about new policies at an early stage and not just to find out about things when they are published as happened recently with the policy on basement extensions.'

Figure 8 - Factors that would assist further community engagement in planning consultations (n=16).



2.24 Earlier sections of this report have highlighted that residents would like planning officers to attend local group meetings and events as a further way to encourage participation. This was also verified in quantitative responses here, where most respondents (95%) indicated that improved access to planning officers would also support further engagement and involvement in local planning consultations (Figure 8).

2.25 In general, qualitative analysis would suggest that improvement to planning notification systems would also help to develop community engagement and involvement. Firstly, there was a concern that the **weekly notification list** of new planning applications was about to be discontinued. Respondents evidently found this weekly notification very helpful and suggested that it be retained:

'We regret that it is proposed to discontinue the weekly list of planning applications which is a valuable method of community involvement.'

'You should not stop sending the planning app lists to people currently on the distribution list. I learnt that this is the intention.'

'It's a shame the weekly/monthly email of current applications to interested parties by ward is ending. This is very useful.'

'The present system of the weekly distribution of Planning Applications by email must be continued.'

2.26 A number of respondents indicated that the community group of which they were a member was not routinely included in local notifications or consultation processes. As a consequence, this required members to be **proactive in researching proposed new developments** or policies that may impact on the local area in order for them to respond or be involved:

'In order to respond, our group needs to be proactive, by scanning the application lists and website to see what is coming up. We receive neither written nor electronic notification of proposed developments.'

'The only way to find out what is happening is to continually check the planning website.'

2.27 Qualitative analysis would also suggest that respondents had concerns around the efficacy of notification systems to inform residents of proposed development within the local area.

'Very few residents get notification of development plans in the immediate vicinity.'

'Community groups, Residents Associations and residents should be sent letters of notification of proposals.'

2.28 In the context of the above, respondents underlined the importance of other traditional methods of distributing planning notifications such as advertising in **Haringey People** and the placement of **posters** displayed in local areas affected:

'Local newspapers are not delivered so the Council must advertise in Haringey People also.'

'I know it sounds odd in the present age, but the practice of sticking a notice on or near the application premises is still a very useful way of alerting residents to an application.'

2.29 What is apparent from qualitative analysis is that, where possible, the Planning Service should support a **multi-faceted approach**, where the diversity of methods deployed can further ensure that planning notifications (for new development or new policies) reach the target residents and communities:

'I would like people whose lives will be profoundly affected by plans and decisions to be informed by all possible methods.'

2.30 Qualitative responses provided elsewhere in this survey indicated that local communities found it difficult to access planning consultations due to the complex nature of planning processes. Further evidence of this concern is provided here where just over 1/2 (53%) of respondents suggested that further **training on local planning issues** would be helpful to support community engagement (Figure 8):

'More training for Community groups.'

'There is little information for the public as to how the planning system works, its implications and how residents should be participating.'

'It would also be useful to have something similar on generic subjects rather than individual applications. For example on shop-fronts, basement extensions

or front garden parking. The idea being for the officers to describe policy and what powers the Council has and for residents to get a better understanding of the issue and raise any questions or concerns.'

- 2.31 Further analysis of qualitative data revealed one important further issue which would help to support further engagement and involvement by the community in local planning consultations. Many respondents indicated that at present, little **feedback** is provided to contributors to planning consultations which makes it difficult to determine the usefulness of submissions and how this has impacted on final plans:

'Often the designated planning officer does not mention comments in her/his report.... '

'Lots of good intentions at consultation meetings and such.... but then? Often disappear without trace or the agreed actions don't happen etc.'

'Consultation should directly involve residents and the results need to be made transparent.... '

'Community Engagement would be improved if the Council were to publish and explain the reasons for their decisions when they are contrary to the views expressed through this process.'

- 2.32 With little feedback as to how contributions have informed consultations and impacted on final plans, there was a perception that planning consultations were not a **two way process**, which left participants feeling frustrated:

'... if you call it a consultation it must be one. It is a two way process or don't bother.'

'Prove that you have listened to what we say.'

'Planning Officers must be open to listening to the public's view.'

'The consultation process is a charade. While it is easy to comment online on planning applications, local residents' opinions seem to be totally ignored. One question whether the planning officers read them.'

- 2.33 Respondents suggested that if it was apparent that consultation contributions had been assessed and recorded where these had influenced planning decisions, this would encourage further participation:

'[Our community group would be more involved] if they felt that their comments were taken more seriously. It is often the case that the comments submitted by this CAAC for example are not mentioned at all in a planning officer's report.....'

3.0 Other issues identified within the survey

- 3.1 To conclude, respondents were invited to provide any further information on any related issues to those covered within the survey. Analysis of these responses highlighted a number of areas for possible follow up.

Role of local Councillors

- 3.2 It was suggested that in recognition of the important role that local councillors play in supporting community engagement with planning processes, further training may help to promote greater understanding within the community

'The Planning Process is complex and difficult to understand. Not only should residents be given clear, readable information but local ward councillors must be trained in the Planning system.'

Planning Enforcement

- 3.3 Although not the focus of this survey, but clearly linked to how the community engages with the planning, planning enforcement was raised as a concern. It was suggested that arrangements for reporting planning infringements are not operating as effectively as they could:

'The survey should also include community engagement with Planning Enforcement, an area which desperately needs to be addressed and which Noel Park has been badly let down on.'

'Enforcement is a real problem. We notify Haringey of infringements and then very little happens; this is discouraging to say the least.'